

28

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
BROWNSVILLE DIVISION**

**United States District Court  
Southern District of Texas  
FILED**

**APR 26 2001**

**Michael N. Milby  
Clerk of Court**

**RAQUEL O. RODRIGUEZ, as legal  
guardian of JOSE L. RODRIGUEZ,**

**Plaintiff,**

Case No. B-CV-96-177

**VS.**

**RIDDELL, INC.; and ALL AMERICAN  
SPORTS CORPORATION, d/b/a  
RIDDELL/ALL AMERICAN.**

**Defendants.**

**PROPOSED JOINT PRETRIAL ORDER**

**1. APPEARANCE OF COUNSEL**

For Raquel O. Rodriguez, as legal guardian of Jose L. Rodriguez, Plaintiff:

Rex Blackburn  
State Bar No. 3170  
Paul J. Augustine  
State Bar No. 4608  
Evans, Keane LLP  
1101 W. River Street, Suite 200  
Post Office Box 959  
Boise, Idaho 83701-0959  
Telephone: (208) 384-1800  
Facsimile: (208) 345-3514

Mark D. Kamitomo  
State Bar No. 18803  
The Markam Group, Inc., P.S.  
421 West Riverside, Suite 1060  
Spokane, Washington 99201  
Telephone: (509) 747-0902  
Facsimile: (509) 747-1993

perform its primary function, to absorb and distribute the energy of a predictable impact. Plaintiff also claims that the helmet utilized a type and arrangement of padding which made its wearer susceptible to brain injury from reasonably foreseeable impacts to the side of the head.

Plaintiff seeks an award of monetary damages to compensate Plaintiff for the costs of Jose's past and future medical and related care, his past and future lost income, and his pain, suffering, disfigurement and loss of enjoyment of life.

Riddell claims that the helmet is just like the many other Riddell helmets worn successfully at the high school, college and professional level, and that no defects are present in Jose Rodriguez's helmet. Riddell also claims that Jose Rodriguez's brain injury was caused by rotational or angular motions or forces and that injury from these motions and forces cannot be prevented by any football helmet. Riddell claims that the helmet has proven itself to be a good design by its successful use and testing. Riddell also claims that Jose had complained of headaches before the scrimmage and should not have been playing in the scrimmage.

### 3. JURISDICTION

This Court has subject matter jurisdiction over this controversy pursuant to 28 U.S.C. 1332, as there is diversity of citizenship between the parties and the amount in controversy exceeds \$75,000. Defendants have done business in Texas and have been properly served with process.

This matter was originally tried in this Court and the original jury verdict was appealed to the Fifth Circuit Court of Appeals, and by decision dated February 14, 2001, this case was remanded for a new trial, the bystander claims of Plaintiff, Raquel O. Rodriguez were dismissed and the Defendant Riddell Sports, Inc was dismissed.



#### 4. MOTIONS

**Plaintiff's Anticipated Motions:** Plaintiff intends to file renewed motions in limine which were originally filed on February 26, 1999 and March 7, 1999 prior to the original trial in this matter. These motions concern the following potential evidence:

a. Regarding Defendant's experts **Ayub K. Ommaya, M.D.** (neurosurgeon), **Thomas A. Gennarelli, M.D.** (neurosurgeon), and **A. R. Garza-Vale, M.D.** (neurosurgeon), Plaintiff objects to the testimony of two of said experts on the ground that testimony from three neurosurgeons on the same issue medical causation is cumulative. (F.R.E. 403.)

b. Regarding Defendants' experts **Ayub K. Ommaya, M.D.** (neurosurgeon), **Thomas A. Gennarelli, M.D.** (neurosurgeon), **A. R. Garza-Vale, M.D.** (neurosurgeon), **James H. McElhaney, Ph.D.** (biomechanicist), **David Halstead** (technician), **Nelson Kraemer** (technician), and **Dan Kult** (unlicensed engineer), Plaintiff objects to their proffered opinions relative to the cause of Plaintiff's brain damage on the grounds that none of the witnesses can identify an event or mechanism of injury to a reasonable degree of scientific probability or certainty. Each witness merely speculates as to possible mechanisms and causes. Their opinions will not assist the trier of fact, are not scientifically reliable, and the probative value of such opinions is substantially outweighed by the potential for undue prejudice and confusion. (F.R.E. 403, 702 and 703.)

c. Regarding Defendants' experts **Messrs. McElhaney** (biomechanicist), **Halstead** (technician), **Kult** (unlicensed engineer) and **Kraemer** (technician), Plaintiff objects to the witnesses offering any opinions regarding medical diagnosis or medical causation on the ground that the witnesses are not qualified to render such opinions. (F.R.E. 702.)



d. Regarding Defendants' experts **Messrs. Halstead** (technician), **Kult** (unlicensed engineer), **Kraemer** (technician) and **McElhaney** (biomechanicist), Plaintiff objects to the witnesses offering any opinions to the effect that no form of protective helmetry could have prevented Mr. Rodriguez's injury or that the subject helmet was not defective merely because injuries of the type suffered by Jose Rodriguez are infrequent, on the grounds that, as to these witnesses, such opinions are mere speculation, cannot be offered by the witness to a reasonable degree of scientific probability or certainty, are not scientifically reliable, will not assist the trier of fact, are beyond the expertise of the witness, and the probative value of such opinions are substantially outweighed by the potential for undue prejudice and confusion. (F.R.E. 403, 702 and 703.)

e. Regarding Defendants' expert **F. M. Fennegan, M.D.** (treating neurosurgeon), Plaintiff objects to any proffered opinion testimony of the witness regarding the issue of whether the mechanism causing injury to Plaintiff Jose Rodriguez was "rotational" or "translational" on the ground that, as to this witness, such an opinion is mere speculation, cannot be offered by the witness to a reasonable degree of scientific probability or certainty, is not scientifically reliable, will not assist the trier of fact, and the probative value of such opinion is substantially outweighed by the potential for undue prejudice and confusion. (F.R.E. 403, 702 and 703.)

f. Regarding Defendants' expert **Kenneth Clark, Ph.D.** (epidemiology), Plaintiff objects to any proffered opinion testimony of the witness relating to the purported frequency of catastrophic brain injuries to football players, the purported causes thereof, or the probability that modifications in protective helmetry would affect the frequency of catastrophic brain injury, on the grounds that, as to this witness, such opinions constitute mere speculation, cannot be offered



by the witness to a reasonable degree of scientific probability or certainty, are not scientifically reliable, will not assist the trier of fact, and the probative value of such opinions is substantially outweighed by the potential for undue prejudice and confusion. (F.R.E. 403, 702 and 703.)

g. Regarding Defendants' expert **Mr. Halstead** (technician), Plaintiff objects to the witness offering any evidence regarding December 14, 1998 drop-testing at the Lou Aguilar Stadium field on the grounds that such testing is irrelevant, was not conducted under circumstances which were substantially similar to those which were extant at the time of Mr. Rodriguez's injury, and the probative value of such evidence is substantially outweighed by the potential for undue prejudice and confusion. (F.R.E. 401, 402, 403 and 702.)

h. Regarding any of Defendants' lay or expert witnesses, Plaintiff objects to the witnesses offering any evidence or opinions to the effect that football is purportedly such an inherently dangerous sport that head injuries are essentially unavoidable, or that Plaintiff Jose Rodriguez purportedly assumed the risk of a substantial head injury, on the grounds that such evidence is irrelevant and the probative value of such evidence is substantially outweighed by the potential for undue prejudice and confusion. (F.R.E. 401, 402, 403, 702 and 703.)

i. Regarding any of Defendants' lay or expert witnesses, Plaintiff objects to the witnesses offering any evidence or opinions to the effect that the Consumer Product Safety Commission has opined regarding the efficacy or safety of football helmets generally, or the VSR-4 helmet specifically, on the grounds that such evidence or opinions are not scientifically reliable, will not assist the trier of fact, are irrelevant, are inadmissible hearsay, and that the probative value of such opinions is substantially outweighed by the potential for undue prejudice and confusion. (F.R.E. 401, 402, 403, 702, 703 and 802.)



j. Regarding any of Defendants' medical expert witnesses. Plaintiff objects to the witnesses offering any evidence or opinions regarding Jose Rodriguez's life expectancy, on the grounds that said testimony was not timely disclosed by Defendants and that none of Defendants' witnesses can offer such evidence or opinions to the requisite degree of proof.

k. Regarding Defendants' expert witness Lawrence Thibault, Sc. D., Plaintiff objects to the witness offering testimony that is not based upon his own independent testing or analysis because it is cumulative, and to testimony concerning the age of Jose Rodriguez's subdural hematoma that is based solely upon Dr. Robert Jone's pathology report dated March 3, 1999. Dr. Thibault is not formally trained in medicine and is not qualified to give opinion testimony regarding medical causation or diagnosis and his work is not peer reviewed and is inadmissible under Daubert.

l. Regarding Defendants' expert witness Ayub K. Ommaya, M.D. Plaintiff objects to the witness presenting testimony based in whole or in part on Dr. Robert Jone's pathology report dated March 3, 1999.

m. Regarding Defendants' testimony or offering evidence not produced in discovery. Plaintiff objects to the Defendants offering testimony or documentary evidence not produced during discovery, including testimony or documentary evidence regarding cold testing.

Plaintiffs reserve the right to assert such other motions as they, from time to time, deem appropriate.

**Defendants' Anticipated Motions:** Defendants intend to file the following motions:

Defendants reserve the right to assert such other motions as they, from time to time, deem appropriate.



## 5. CONTENTIONS OF THE PARTIES

### Plaintiffs' Claims:

a. Strict liability in tort. As to Defendant Riddell, Inc., only, Plaintiff asserts a claim for strict product liability. The Plaintiff contends that the VSR-4 football helmet was defective and unreasonably dangerous due to its defective design. Specifically, the Plaintiff alleges that the energy attenuation padding in the back/side/neck liner of the VSR-4 helmet worn by Jose Rodriguez was insufficient to adequately protect users from reasonably foreseeable blows to the side of the helmet. Plaintiff also claims that the design configuration of these pads within the helmet would not adequately protect users from reasonably foreseeable blows to the side of the helmet. Plaintiff intends to show that at the time Riddell sold the VSR-4 helmet prior to its use by Jose Rodriguez, it used padding (either Rubatex 3952 or Monarch 6903) with inadequate energy attenuation capabilities, as compared to newer padding made available to Riddell prior to its sale.

b. Negligence. As to both Defendants, Plaintiff contends that the VSR-4 helmet worn by Jose Rodriguez was negligently designed, tested and reconditioned because it did not perform its primary function: to properly absorb and distribute the energy of a predictable impact so as to avoid brain injury. Rather, the design of the helmet permitted a dangerous level of energy to be delivered directly to Jose Rodriguez's skull and brain which resulted in a permanent brain injury. Plaintiff further contends that Defendant Riddell, Inc. negligently failed to promptly evaluate a newer energy-attenuating foam (Rubatex 3953) which would have significantly reduced the likelihood that Jose Rodriguez would have been injured in the scrimmage. As a result of



Riddell's failure to act, Riddell and Riddell All American continued to use old, inferior padding in Jose Rodriguez's helmet at the time it was recertified.

c. Gross Negligence. At the time Jose Rodriguez's helmet was recertified by Riddell's agent, Riddell/All American, both parties acted with gross negligence by failing to remove what it knew, or in the exercise of reasonable care should have known, to be inadequate padding for the helmet.

d. Damages. As of the time of the first trial in March, 1999, Plaintiff incurred approximately \$1,258,908.90 in medical expenses for the treatment of Jose Rodriguez's permanent brain injury. Since that time, plaintiff estimates that Jose has incurred another \$200,000.00 in related expenses which have been paid by Medicaid. Plaintiff has requested records from Medicaid which plaintiff expects to receive by April 30, 2001. Plaintiff contends she is entitled to damages from Defendants, including, but not limited to, Jose Rodriguez's loss of enjoyment of life, out-of-pocket expenses associated with the care of Jose Rodriguez, lost wages and earning capacity, physical and mental pain and suffering, emotional distress, and future medical expenses and care.

**Defendants' Claims:**

a. Strict liability in tort. The Defendants deny that the football helmet was defective or unreasonably dangerous due to a defective design. Specifically, the Defendants deny that the football helmet was unreasonably dangerous taking into consideration the utility of the product and risk involved in its use.

The Defendants deny that there was a safer alternative design. The Defendants state there was no design other than the one actually used that in reasonable probability would have



prevented or significantly reduced the risk of the injury in question without substantially impairing the product's utility and was economically and technologically feasible at the time the football helmet left the control of Riddell by the application of existing or reasonably achievable scientific knowledge. Defendants deny that any defect in the helmet was a producing cause of Jose Rodriguez's condition.

b. Negligence. Defendants deny that they were negligent in the design, testing and reconditioning of the football helmet. Defendants contend that they used ordinary care in the design testing and reconditioning of the football helmet and used that degree of care that a football helmet manufacturer of ordinary prudence would have used under the same or similar circumstances. Defendants deny that any acts or omissions of Riddell were a proximate cause of Jose Rodriguez's condition.

c. Gross Negligence. Riddell and All American deny that they were grossly negligent. Defendants deny that they were consciously indifferent to the rights, welfare, or safety of the persons wearing Riddell football helmets.

d. Defenses.

(1) Defendants contend that Jose Rodriguez was himself guilty of acts, wrongs and omissions which constituted comparative negligence and comparative fault. Specifically, Jose Rodriguez had been having headaches for several days and possibly more than a week before the scrimmage and kept that information from his coaches and trainers. Defendants claim that Jose Rodriguez knew that if he told the coaches and/or trainers that he was having headaches, they would not let him play in the scrimmage. Defendants claim that Jose Rodriguez knowingly and voluntarily assumed and encountered the risk of playing football after having had headaches for



several days of which he was aware.

(2) Defendants contend, in the alternative, that Jose Rodriguez suffered from preexisting conditions, arteriovenous malformations, aneurisms, vascular arterial problems, defects, and preexisting pathologies, and that his condition was solely caused by and was the result of these preexisting conditions.

(3) Defendants contend, in the alternative, that the medical condition of Jose Rodriguez was caused by rotational and/or angular forces or motions that could not be prevented by any football helmet.

(4) Defendants contend, in the alternative, that the medical condition of Jose Rodriguez was the result of and solely caused by persons, factors, instrumentalities, circumstances and conditions over which Riddell, Inc., and All American Sports Corporation, d/b/a Riddell/All American, had no control or right of control.

(5) Defendants contend, in the alternative, that they complied with all applicable industry standards and requirements and that all of Plaintiffs' causes of action are barred by the Doctrine of Preemption.

(6) Defendants incorporate by reference all the answers, denials and defenses contained in Defendants' First Amended Original Answer previously filed with the Court as if fully and at large set forth herein.

(7) There is no gross negligence or entitlement to punitive damages because the helmet was designed and manufactured to accepted, recognized standards for football helmets.

c. Damages. Defendants contend that Jose Rodriguez has never had any conscious physical pain or mental suffering. Defendants contend that Jose Rodriguez has a very limited life



expectancy. Defendants contend that Plaintiff is not entitled to recovery of exemplary damages.

## **6. ADMISSIONS OF FACT**

The parties will stipulate that the following facts require no proof:

- a. Plaintiff is Raquel O. Rodriguez as legal guardian of Jose L. Rodriguez.
- b. Raquel O. Rodriguez was appointed legal guardian of her son, Joe L. Rodriguez, on or about February 26, 1999.
- c. Jose Rodriguez was born on June 7, 1977.
- d. On Thursday, August 24, 1995, Jose Rodriguez was playing football for Los Fresnos High School in a scrimmage against Santa Rosa High School.
- e. Riddell, Inc. is headquartered in Chicago, Illinois.
- f. Riddell, Inc., is engaged in the business of selling football helmets as a part of its business, i.e., the selling, leasing, or otherwise placing in the course of commerce products similar to the product in question by transactions that are essentially commercial in character.
- g. Riddell, Inc., designs, manufactures and packages the VSR-4 helmet.
- h. All American Sports Corporation, dba Riddell/All American is headquartered in Elyria, Ohio.
- i. All American Sports Corporation, dba Riddell/All American, is engaged in the business of reconditioning football helmets as a part of its business, i.e., the selling, reconditioning, or otherwise placing in the course of commerce products similar to the product in question by transactions that are essentially commercial in character.
- j. The VSR-4 model football helmet was first marketed on or about the year 1992 by Riddell, Inc.



k. Jose Rodriguez now suffers from serious, permanent, and disabling ailments.

l. Plaintiffs' causes of action accrued prior to September 1, 1995, and Plaintiffs' Petition was filed August 30, 1996.

m. Exhibit P3 (admitted into evidence during the first trial) is the Riddell VSR-4 model football helmet that Joe Rodriguez was wearing on August 24, 1995 during his scrimmage.

## **7. CONTESTED ISSUES OF FACT**

a. Whether there was a design defect in the VSR-4 football helmet at the time it left the possession of Defendant that was a producing cause of the injury in question.

b. Whether there was a "safer alternative design" to the VSR-4 helmet that in reasonable probability would have prevented or significantly reduced the risk of injury in question without substantially impairing the helmet's utility and whether such "safer alternative design" was economically and technologically feasible at the time that the helmet left Riddell's control by application of existing or reasonably achievable scientific knowledge.

c. Whether the VSR-4 football helmet supplied by Defendants was unfit for the ordinary purposes for which such football helmets are used because of a defect, and if so, was such unfit condition a proximate cause of Jose Rodriguez's injury.

d. Whether any of Defendants' acts or omissions may be found to be a proximate cause of Plaintiff's injuries or damages.

e. Whether any of Defendants' acts or omissions which may be found to be a proximate cause of Plaintiffs' injuries rise to the level of "gross negligence."

f. Whether Jose Rodriguez was suffering headaches before or at the time of the



scrimmage or, even if he was suffering headaches, whether he should have been playing in the scrimmage; even if proven, whether such acts or omissions would constitute comparative negligence which was a proximate cause of Jose Rodriguez's injuries and damages.

g. Whether Jose Rodriguez suffered from any non-traumatic medical condition which would predispose him to, or cause, his injuries and whether Defendants can offer any credible medical evidence of same to the requisite degree of proof.

h. Whether Defendants complied with applicable industry standards incident to the design, manufacture or recertification of the VSR-4 helmet, and whether Defendants can offer any credible evidence which would invoke the Doctrine of Preemption.

## **8. AGREED PROPOSITIONS OF LAW**

a. "Design defect" is a condition of the product that renders it unreasonably dangerous as designed, taking into consideration the utility of the product and the risk involved in its use.

For a design defect to exist, there must have been a safer alternative design.

(P.J.C. 71.4B)

b. "Safer alternative design" means a product design other than the one actually used that in reasonable probability:

(1) would have prevented or significantly reduced the risk of the injury in question without substantially impairing the product's utility; and

(2) was economically and technologically feasible at the time the product left the control of Riddell by the application of existing or reasonably achievable scientific knowledge.

(P.J.C. 71.4B)



c. “Producing cause” means an efficient, exciting, or contributing cause that, in a natural sequence, produces the injury. There may be more than one producing cause.

(P.J.C. 70.1)

d. “Proximate cause” means that cause which, in a natural and continuous sequence, produces an event, and without which cause such event would not have occurred. In order to be a proximate cause, the act or omission complained of must be such that a person using ordinary care would have foreseen that the event, or some similar event, might reasonably result therefrom.

There may be more than one proximate cause of an event. (P.J.C. 70.2)

e. The “business of selling” means involvement, as a part of its business, in selling, leasing, or otherwise placing in the course of commerce products similar to the product in question by transactions that are essentially commercial in character. (P.J.C. 70.4)

f. “Negligence” means failure to use ordinary care, that is, failing to do that which a person of ordinary prudence would have done under the same or similar circumstances or doing that which a person of ordinary prudence would not have done under the same or similar circumstances.

g. “Ordinary care” means that degree of care that would be used by a person of ordinary prudence under the same or similar circumstances. (P.J.C.2.1.)

## **9. CONTESTED PROPOSITIONS OF LAW**

The parties have each submitted Requested Jury Charges, including Instructions, Definitions and Special Interrogatories. (See Exhibits P-4 and D-4 to the parties’ respective Proposed Pretrial Orders.) Except to the extent that the parties have agreed to applicable



Propositions of Law as set forth in the immediately preceding section, the parties dispute the applicability or formulation of the legal propositions set forth in the others' Requested Jury Charges, including Instructions, Definitions and Special Interrogatories.

Plaintiff objects to and disputes the legal applicability or formulation of:

- a. Defendants' Requested Special Instruction No. 3, "New and Independent Cause."

This instruction, based on P.J.C. 70.3, is not properly given in the present case. See *First Interstate Bank v. Roper Corp.*, 686 S.W.2d 602, 605 (Tex. 1985).

- b. Any instruction, definition or charge based upon P.J.C. 71.3, which defines the terms "defect" and "unreasonably dangerous" in the context of a manufacturing defect or impure product, as it is not applicable in the present design defect case.

- c. Any instruction, definition or charge which relates to the defenses of comparative negligence, assumption of risk, alteration, misuse or preemption, on the grounds that the evidence does not support any of these defenses, the defenses are legally inapplicable to Plaintiff's theories of liability, and/or the defenses are not recognized under controlling law. (See, e.g., *Keen v. Ashot*, 748 S.W.2d 91 (Tex. 1988) (failure to detect or guard against a defective product is not a defense). And see *Henderson v. Ford Motor Co.*, 519 S.W.2d 87 (Tex. 1974) (a plaintiff assumes the risk of injury only if he actually knew of the condition that caused the injury, fully appreciated the nature and extent of the danger involved, and voluntarily encountered the danger. The definition of assumption of risk found in § 402A, cmt. N of the Restatement (Second) of Torts, is rejected). And see *Duncan v. Cessna Aircraft Co.*, 665 S.W.2d 414 (Tex. 1984) (even when factually applicable, assumption of the risk and misuse are subsumed within the contributory responsibility question).)

d. Plaintiff reserves the right to assert further objections upon submission of the evidence by both parties.

Defendants will object to and dispute the legal applicability or formulation of various definitions, instructions and charges. However, Defendants do not feel it appropriate to make any such objections until

Plaintiff has produced in admissible form their case in chief.

**10. EXHIBITS**

- a. See Exhibit P-1, Plaintiff's Exhibit List.
- b. See Exhibit D-1, Defendants' Exhibit List.

**11. WITNESSES**

- a. See Exhibit P-2, Plaintiff's Witness List.
- b. See Exhibit D-2, Defendants' Witness List.

**12. SETTLEMENT**

The parties are exchanging settlement offers.

**13. TRIAL**

- a. Probable length of trial is seven court days.
- b. Potential logistical problems include the necessity of providing ample notice of their need to testify on a specific date to numerous out-of-state expert witnesses for both the Plaintiff and Defendants.



#### **14. ATTACHMENTS**

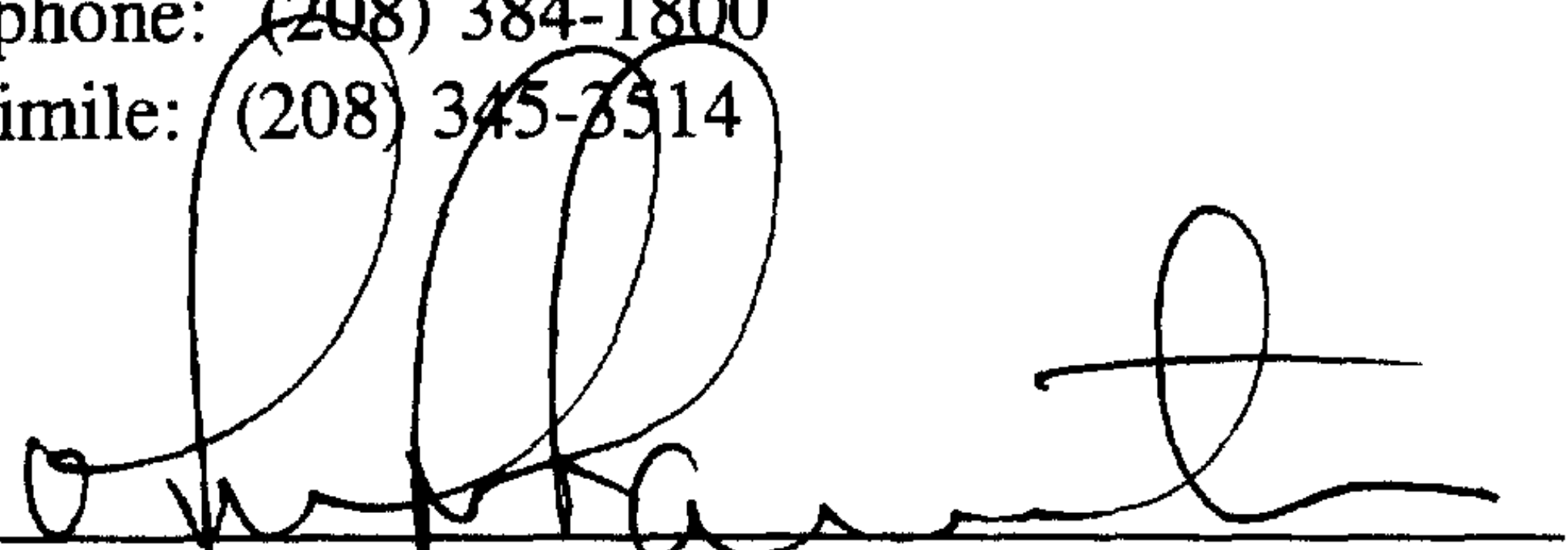
The following were previously submitted to the Court incident to the parties' respective proposed Pretrial Orders:

- a. Please see Exhibit P-1, Plaintiff's Exhibit List, and Exhibit D-1, Defendants' Exhibit List.
- b. Please see Exhibit P-2, Plaintiff's Witness List, and Exhibit D-2, Defendants' Witness List.
- c. Please see Exhibit P-3, Plaintiff's Proposed Voir Dire Questions, and Exhibit D-3, Defendants' Proposed Voir Dire Questions.
- d. Please see Exhibit P-4, Plaintiff's Requested Jury Charges, including Instructions, Definitions and Special Interrogatories, and Exhibit D-4, Defendants' Requested Jury Charges, including Instructions, Definitions and Special Interrogatories.
- e. Please see Exhibit P-5, containing documentation of the qualifications of Plaintiff's expert witnesses, and Exhibit D-5, containing documentation of the qualifications of Defendants' expert witnesses.

DATED this 24 day of April, 2001.

EVANS, KEANE LLP  
1101 W. River Street, Suite 200  
P. O. Box 959  
Boise, Idaho 83701-0959  
Telephone: (208) 384-1800  
Facsimile: (208) 345-3514

By



REX BLACKBURN  
State Bar No. 3170  
PAUL J. AUGUSTINE  
State Bar No. 4608

MARK D. KAMITOMO  
State Bar No. 18803  
The Markam Group, Inc., P.S.  
421 West Riverside, Suite 1060  
Spokane, Washington 99201  
Telephone: (509) 747-0902  
Facsimile: (509) 747-1993

J. ARNOLD AGUILAR  
State Bar No. 00936270  
Federal ID. No. 6822  
Artemis Square, Suite H-2  
1200 Central Boulevard  
Brownsville, Texas 78520  
Telephone: (956) 504-1100  
Facsimile: (956) 504-1408

Plaintiff, Raquel O. Rodriguez as guardian of  
Jose L. Rodriguez



**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
BROWNSVILLE DIVISION**

**RAQUEL O. RODRIGUEZ as legal guardian of  
JOSE L. RODRIGUEZ,**

**Plaintiff,**

**VS.**

**RIDDELL, INC.; and ALL AMERICAN SPORTS  
CORPORATION d/b/a RIDDELL/ALL  
AMERICAN,**

**Defendants.**

**Case No. B-CV-96-177**

**EXHIBIT P-1 TO THE  
PROPOSED JOINT PRETRIAL ORDER**

**PLAINTIFF'S EXHIBIT LIST**

**EXHIBIT P-1**

**PLAINTIFF'S EXHIBIT LIST**

*Rodriguez v. Riddell Sports, Inc., et al.*

NO.	DESCRIPTION	DATE	WITNESSES	MARKED FOR ID	OFFERED	ADMITTED	CONDIT'LY	
							ADMITTED	DENIED

P-1	Los Fresnos School District Invitation to Bid							
P-2	Riddell's NOCSAE Test Results for Helmet Model VSR-4, from December, 1992 through August, 1997							
P-3	The VSR-4 helmet used by Jose Rodriguez on August 24, 1995							
P-4	Helmet timeline from Dr. Stalnaker - (Abbreviated from Stal000000018-24)							
P-5	Riddell drawing of Occipital Fitting Pad - Back/Neck/Side, Drawing No. 17086							
P-6	Riddell drawing of Energy Pad - Back/Neck/Side Liner, Drawing No. 17088							
P-7	Enlargement of Riddell Drawing Number 17264 - Medium - Back/Neck/Side Liner (Riddell-0033)							
P-8	Enlargement of Riddell Drawing Number 17257 - Large - Back/Neck/Side Liner (Riddell-0035)							
P-9	Riddell drawing of Fitting Pad - Back/Neck/Side Liner, Drawing No. 17087							
P-10	Enlargement of Riddell Drawing Number 17296 VSR-4 Assembly (Riddell-0032)							
P-11	Enlargement of Riddell Drawing Number 17258 -							



**EXHIBIT P-1**

**PLAINTIFF'S EXHIBIT LIST**

*Rodriguez v. Riddell Sports, Inc., et al.*

NO.	DESCRIPTION	DATE	WITNESSES	MARKED FOR ID	OFFERED	ADMITTED	CONDITIONALLY	
							ADMITTED	DENIED
	Medium - Back/Neck/Side Liner (Riddell-0034)							
P-12	Riddell drawing of Neck - Back/Neck/Side, Drawing No. 17085 Fitting Pad - Back/Neck/Side Liner							
P-13	Riddell 1993-95 Football Catalog							
P-14	Exemplar of back/head/neck liner of VSR-4 with <b>old</b> foam (Monarch 6903/Rubatex 3952)							
P-15	Exemplar of back/head/neck liner of VSR-4 with <b>new</b> foam (Monarch 6905/Rubatex 3953)							
P-16	Monarch F-06000 Series NBR-PBC · Nitril-Polyvinyl Chloride Product Specification							
P-17	Rubatex® Stock Physical Properties for Stock Number R-3952-V (6/93)							
P-18	Rubatex® Press Molded Buns Physical Properties for Type R-3953-V (3/1/98)							
P-19	Rubatex® Stock Physical Properties for Stock Number R-3953-V (8/94)							
P-20	Exemplar of Rubatex 3953 foam or equivalent (Dr. Stalnaker depo exhibit 142)							
P-20A	Exemplar of Rubatex 3953 foam - Energy Pad							
P-20B	Exemplar of Rubatex 3953 foam - Fitting Pad							

**EXHIBIT P-1**

**PLAINTIFF'S EXHIBIT LIST**

***Rodriguez v. Riddell Sports, Inc., et al.***

NO	DESCRIPTION	DATE	WITNESSES	MARKED FOR ID	OFFERED	ADMITTED	CONDITIONALLY	
							ADMITTED	DENIED

P-21	Exemplar of Monarch 6903 foam							
P-22A	Enlargement Photo of Helmet Liner in VSR-4 helmet worn by Jose Rodriguez							
P-22B	Enlargement Photo of Helmet Liner in VSR-4 helmet worn by Jose Rodriguez							
P-23	Compression Set Observations of Rubatex 3953 dated 2/7/94							
P-24	Compression Set Observations of Rubatex 3953 dated 4/5/94							
P-25	Compression Set Observations of Rubatex 3953-V dated 5/13/94							
P-26	Impact Test Results of Rubatex 3953 - hot/ambient (undated).							
P-27A	Impact Test Results of Rubatex 3953-V - cold. Dated 4/5/94.							
P-27B	Impact Test Results of Rubatex 3953-V - hot. Dated 4/5/94.							
P-28	Impact Test Results of Rubatex 3953 - ambient. Dated 5/5/94.							
P-29	Letter from Riddell to George Hoffman rejecting material (4/19/91)							



**EXHIBIT P-1**  
**PLAINTIFF'S EXHIBIT LIST**  
*Rodriguez v. Riddell Sports, Inc., et al.*

NO.	DESCRIPTION	DATE	WITNESSES	MARKED FOR ID	OFFERED	ADMITTED	CONDITIONALLY	
							ADMITTED	DENIED
P-30	Letter from George Hoffman to Nelson Kraemer dated 11/1/90 re: request to evaluate material							
P-31	Riddell's NOCSAE Test Results of Hoffman material (4/18/91)							
P-32	Riddell's Density Test Results of Hoffman material (1/4/91) (100006)							
P-33	Rubatex invoice to Riddell for Rubatex 3952 - 7/15/93							
P-34	Rubatex change order reflecting Riddell's cancellation of 7/15/93 order for Rubatex 3952							
P-35	Invoices to Riddell for Rubatex 3952 for the period 1991 - 1993							
P-36	1993 Gross Sales from Monarch to Riddell							
P-37	1994 Gross Sales from Monarch to Riddell							
P-38	Final Report to the National Operating Committee on Standards for Athletic Equipment (NOCSAE) for the period 8/1/89 through 1/31/90							
P-39	NOCSAE Football Ad Hoc Committee meeting minutes 11/29/89							
P-40	NOCSAE Technical Resources Committee Meeting Agenda - December 15, 1989							

**EXHIBIT P-1**  
**PLAINTIFF'S EXHIBIT LIST**  
***Rodriguez v. Riddell Sports, Inc., et al.***

NO	DESCRIPTION	MARKED FOR ID					CONDITIONALLY ADMITTED		
		DATE	WITNESSES	OFFERED	ADMITTED	DENIED			
P-41	Standard Method of Impact Test and Performance Requirements for Football Helmets, Prepared by the National Operating Committee for Standards in Athletic Equipment (NOCSAE), September, 1973								
P-42	Troubleshooting Guide for Test Equipment and Impact Testing, prepared by National Operating Committee on Standards for Athletic Equipment, Final Draft - September, 1996								
P-43	Standard Performance Specification for Recertified Football Helmets, prepared by National Operating Committee on Standards for Athletic Equipment, Final Draft - September, 1996								
P-44	Laboratory Procedural Guide for Recertifying Football Helmets, prepared by National Operating Committee on Standards for Athletic Equipment, Final Draft - September, 1996								
P-45	Standard Method of Impact Test and Performance Requirements for Football Helmets, prepared by National Operating Committee on Standards for Athletic Equipment.								
P-46	Standard Drop Test Method and Equipment Used in Evaluating the Performance Characteristics of Protective Headgear, prepared by National Operating Committee on Standards for Athletic Equipment, Final								



**EXHIBIT P-1**

**PLAINTIFF'S EXHIBIT LIST**

***Rodriguez v. Riddell Sports, Inc., et al.***

NO	DESCRIPTION	MARKED FOR ID					CONDITIONALLY		DENIED
		DATE	WITNESSES	OFFERED	ADMITTED	OFFERED	ADMITTED	ADMITTED	

	Draft - September, 1996									
P-47	Standard Performance Specification for Newly Manufactured Football Helmets, prepared by National Operating Committee on Standards for Athletic Equipment, Final Draft - September, 1996									
P-48	Laboratory Procedural Guide for Certifying Newly Manufactured Football Helmets, prepared by National Operating Committee on Standards for Athletic Equipment, Final Draft - September, 1996									
P-49	All American's Count of Helmets Recertified and Rejected dated 5/11/95									
P-50	Reconditioning Contract from All American to Los Fresnos High School dated 12/15/94									
P-51	NOCSAE "Standard Method of Impact Test and Performance Requirements for Football Helmets" - revised July 1990									
P-52	All American's Count & Condition Report dated 4/13/95 re: reconditioning of Los Fresnos Helmets									
P-53	All American's Helmet Factory Instructions dated 4/13/95 re: reconditioning of Los Fresnos Helmets									
P-54	Los Fresnos High School Invoice from All American for Reconditioning Helmets - dated 5/11/95									

**EXHIBIT P-1**

**PLAINTIFF'S EXHIBIT LIST**

*Rodriguez v. Riddell Sports, Inc., et al.*

NO	DESCRIPTION	DATE	WITNESSES	MARKED FOR ID	OFFERED	ADMITTED	CONDITIONALLY	
							ADMITTED	DENIED
P-55	Photographs depicting geometry of other helmets							
P-56	Dr. Stalnaker's Modified VSR-4 helmet							
P-57	Cross-section illustration of helmet w/proposed intermediate shell sizes							
P-57A	XL - half-shell of Riddell helmet - <b>modified</b>							
P-57B	XL - half-shell of Riddell helmet - <b>unmodified</b>							
P-57C	Large - half-shell of Riddell helmet - <b>unmodified</b>							
P-57D	Med. - half-shell of Riddell helmet - <b>unmodified</b>							
P-57E	Foam remnants from Exhibit 57A through 57D							
P-57F	Energy Pad from Exhibit 57A							
P-57G	Fitting Pad from Exhibit 57A							
P-58	Exemplar - Large VSR-4 helmet							
P-59	Back- neck liner from VSR-3/VSR-1							
P-60A	Photo of Test Sequence #1 - NOCSAE Side Impact Tests - dated 1/19/98							
P-60B	Photo of Test Sequence #1 - NOCSAE Side Impact Tests - dated 1/19/98							
P-61	Videotape of Dr. Stalnaker drop-testing VSR-4 helmets							



**EXHIBIT P-1**

**PLAINTIFF'S EXHIBIT LIST**

*Rodriguez v. Riddell Sports, Inc., et al.*

NO	DESCRIPTION	DATE	WITNESSES	MARKED FOR ID	OFFERED	ADMITTED	CONDITIONALLY ADMITTED	DENIED

	in Tennessee							
P-61A	Out-takes of Exhibit No.61.							
P-62	Chart Showing NOCSAE test results of VSR-4 helmet as modified by Dr. Stalnaker and VSR-4 helmet with Rabatex 3953.							
P-62A	Enlargement of Exhibit No. 62.							
P-63	Results of NOCSAE drop test performed by Dr. Stalnaker - <b>5' Unmodified Helmet.</b>							
P-63A	Enlargement of Exhibit No. 63.							
P-64	Results of NOCSAE drop test performed by Dr. Stalnaker - <b>7' Unmodified Helmet.</b>							
P-64A	Enlargement of Exhibit No. 64.							
P-65	Results of NOCSAE drop test performed by Dr. Stalnaker - <b>5' Modified Helmet.</b>							
P-65A	Enlargement of Exhibit No. 65.							
P-66	Results of NOCSAE drop test performed by Dr. Stalnaker - <b>7' Modified Helmet.</b>							
P-66A	Enlargement of Exhibit No. 66.							
P-67	Enlargement of Photo of Test Sequence #1 - NOCSAE							

**EXHIBIT P-1**

**PLAINTIFF'S EXHIBIT LIST**

*Rodriguez v. Riddell Sports, Inc., et al.*

NO	DESCRIPTION	MARKED FOR ID					CONDITLY	
		DATE	WITNESSES	OFFERED	ADMITTED	DENIED	ADMITTED	DENIED

	Instruments - dated 1/19/98							
P-68	Weather reports - NOAA Certified Weather Data from Brownsville, TX (June-August '95)							
P-69	Weather report - NOAA Certified Weather Data from Brownsville, TX (December '98)							
P-70	Digital Video Captures of Rodriguez Scrimmage Tape							
P-71	Computerized video display of impact frames							
P-72	"Titles & Selects" slow-motion videotape of 8/24/95 scrimmage							
P-72A	Out-takes of Exhibit No. 72.							
P-73	Videotape film of football scrimmage dated August 24, 1995, Leo Aguilar Memorial Stadium							
P-73A	Out-takes of Exhibit No. 73 (event play).							
P-73B	Out-takes of Exhibit No. 73.							
P-74	Photo of Leo Aguilar field testing dated 12/16/98 - (Stalnak deposition Exhibit 212-35)							
P-75	Photo of Leo Aguilar field testing dated 12/16/98 - (Stalnak deposition Exhibit 212-32)							
P-76	Photo of Leo Aguilar field testing dated 12/16/98 -							



**EXHIBIT P-1**  
**PLAINTIFF'S EXHIBIT LIST**  
*Rodriguez v. Riddell Sports, Inc., et al.*

NO	DESCRIPTION	DATE	WITNESSES	MARKED FOR ID	OFFERED	ADMITTED	CONITLY ADMITTED	DENIED
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	(Stalnak deposition Exhibit 212-36)							
P-77A	Photo of Leo Aguilar field testing dated 12/16/98 - (Stalnak deposition Exhibit 213-1)							
P-77B	Photo of Leo Aguilar field testing dated 12/16/98							
P-77C	Photo of Leo Aguilar field testing dated 12/16/98							
P-78A	Photo of Leo Aguilar Field w/Cellulose Overlays used in reconstruction							
P-78B	Photo of Leo Aguilar Field w/Cellulose Overlays used in reconstruction							
P-78C	Photo of Leo Aguilar Field w/Cellulose Overlays used in reconstruction							
P-78D	Photo of Leo Aguilar Field w/Cellulose Overlays used in reconstruction							
P-78E	Photo of Leo Aguilar Field w/Cellulose Overlays used in reconstruction							
P-78F	Photo of Leo Aguilar Field w/Cellulose Overlays used in reconstruction							
P-78G	Photo of Leo Aguilar Field w/Cellulose Overlays used in reconstruction							
P-79A	Sample of the Cellulose depicting outlines of field from							

**EXHIBIT P-1**  
**PLAINTIFF'S EXHIBIT LIST**

*Rodriguez v. Riddell Sports, Inc., et al.*

NO	DESCRIPTION	DATE	WITNESSES	MARKED FOR ID	OFFERED	ADMITTED	CONDITIONALLY	
							ADMITTED	DENIED
	videotape used in reconstruction on 12/16/98							
P-79B	Sample of the Cellulose depicting outlines of field from videotape used in reconstruction on 12/16/98							
P-79C	Sample of the Cellulose depicting outlines of field from videotape used in reconstruction on 12/16/98							
P-79D	Sample of the Cellulose depicting outlines of field from videotape used in reconstruction on 12/16/98							
P-79E	Sample of the Cellulose depicting outlines of field from videotape used in reconstruction on 12/16/98							
P-79F	Sample of the Cellulose depicting outlines of field from videotape used in reconstruction on 12/16/98							
P-79G	Sample of the Cellulose depicting outlines of field from videotape used in reconstruction on 12/16/98							
P-80	3-D Model of Position Analysis of Jose Rodriguez during his last play of 8/24/95 scrimmage							
P-81	Chart Depicting Jose Rodriguez's Head Position relative to field on last play of scrimmage (view from above)							
P-82	Chart showing relationship between SI, HIC, and Injury Potential (AIS)							
P-82A	Enlargement of Chart showing relationship between SI,							



**EXHIBIT P-1**

**PLAINTIFF'S EXHIBIT LIST**

*Rodriguez v. Riddell Sports, Inc., et al.*

NO	DESCRIPTION	DATE	WITNESSES	MARKED FOR ID	OFFERED	ADMITTED	CONDIT'LY ADMITTED	DENIED

	HIC, and Injury Potential (AIS)							
P-83	Chart depicting Riddell's NOCSAE 60" Drops to Side, Ambient Temperature, 8% Risk of AIS 4 Brain Injury							
P-83A	Enlargement of chart depicting Riddell's NOCSAE 60" Drops to Side, Ambient Temperature, 8% Risk of AIS 4 Brain Injury							
P-84	Chart depicting Riddell's NOCSAE 60" Drops to Side, High Temperature, 8% Risk of AIS 4 Brain Injury							
P-84A	Enlargement of chart depicting Riddell's NOCSAE 60" Drops to Side, High Temperature, 8% Risk of AIS 4 Brain Injury							
P-85	Chart depicting Riddell's NOCSAE 60" Drops to Side, High Temperature, 13% Risk of AIS 4 Brain Injury							
P-85A	Enlargement of chart depicting Riddell's NOCSAE 60" Drops to Side, High Temperature, 13% Risk of AIS 4 Brain Injury							
P-86	Chart depicting Riddell's NOCSAE 60" Drops to Side, Ambient Temperature, 13% Risk of AIS 4 Brain Injury							
P-86A	Enlargement of chart depicting Riddell's NOCSAE 60" Drops to Side, Ambient Temperature, 13% Risk of AIS 4 Brain Injury							
P-87	Chart depicting Riddell's NOCSAE 60" Drops to Side,							

**EXHIBIT P-1**

**PLAINTIFF'S EXHIBIT LIST**

*Rodriguez v. Riddell Sports, Inc., et al.*

NO	DESCRIPTION	DATE	WITNESSES	MARKED FOR ID	OFFERED	CONDITIONALLY	
						ADMITTED	DENIED
	High Temperature, 18% Risk of AIS 4 Brain Injury						
P-87A	Enlargement of chart depicting Riddell's NOCSAE 60" Drops to Side, High Temperature, 18% Risk of AIS 4 Brain Injury						
P-88	Stalnaker Test Data chart re: Percentage Risk of AIS 4 Brain Injury						
P-88A	Enlargement of Stalnaker Test Data chart re: Percentage Risk of AIS 4 Brain Injury						
P-89	Stalnaker Test Data chart re: Severity Index						
P-89A	Enlargement of Stalnaker Test Data chart re: Severity Index						
P-90	AIS 4 Brain Injuries list						
P-90A	Enlargement of AIS 4 Brain Injuries list						
P-91	Chart depicting Riddell's NOCSAE 60" Drops to Side, Ambient Temperature, 18% Risk of AIS 4 Brain Injury						
P-91A	Enlargement of chart depicting Riddell's NOCSAE 60" Drops to Side, Ambient Temperature, 18% Risk of AIS 4 Brain Injury						
P-92	Illustration of Jose Rodriguez's helmet "bottoming out" and effect on his brain						



**EXHIBIT P-1**  
**PLAINTIFF'S EXHIBIT LIST**

*Rodriguez v. Riddell Sports, Inc., et al.*

DESCRIPTION		MARKED FOR ID										WITNESSES			DATE	OFFERED			ADMITTED			CONDITIONALLY ADMITTED			DENIED		
NO																											
P-93	Overlay of brain diagramming (top view) sub-galeal edema; SDH; hemispheric swelling; intra-cerebral hemorrhage; contra lateral injuries																										
P-94	Medical Records of Valley Baptist Medical Center																										
P-95	Medical Records of Valley Diagnostic																										
P-96	Medical Records of St. David's Hospital																										
P-97	Medical Records of Los Fresnos Pharmacy																										
P-98	Medical Records of Healthcare Rehab Center																										
P-99	Medical Records of Centre for Neuro Skills																										
P-100	Medical Records of Harlingen EMS																										
P-101	Medical Records of VBMC Home Health																										
P-102	Medical Records of Vincent Virgadamo, M.D.																										
P-103	Medical Records of Harlingen Anesthesia																										
P-104	Medical Records of Bliss Clark, M.D.																										
P-105	Medical Records of F. Fennegan, M.D.																										
P-106	Medical Records of St. Luke's Episcopal Hospital																										
P-107	Medical Records of Fry's Prescription Pharmacy																										
P-108	Medical Records of Advanced Medical Supply																										

**EXHIBIT P-1**

**PLAINTIFF'S EXHIBIT LIST**

***Rodriguez v. Riddell Sports, Inc., et al.***

NO	DESCRIPTION	DATE	WITNESSES	MARKED FOR ID	OFFERED	ADMITTED	CONDITIONALLY	
							ADMITTED	DENIED
P-109	Medical Records of Jonathan Dora, M.D.							
P-110	Medical Records of Responsive Providers, Inc.							
P-111	Medical Records of VBMC Home Infusion Therapy Pharmacy							
P-112	Medical Records of Lost Fresnos EMS							
P-113	Medical Records of R. Solis, M.D.							
P-114	Medical Records of Raul Villanueva, M.D.							
P-115	Medical Records of Inland Medical Rehab							
P-115A	Selected Medical Records							
P-116	CT scans of Jose Rodriguez's head dated 8/24/95							
P-116A	Selected Enlargement of CT scans of Jose Rodriguez's head dated 8/24/95 - <b>Slice No. 12</b>							
P-117	CT scans of Jose Rodriguez's head dated 8/25/95							
P-117A	Selected Enlargement of CT scans of Jose Rodriguez's head dated 8/25/95 - <b>Slice No. 10</b>							
P-117B	Selected Enlargement of CT scans of Jose Rodriguez's head dated 8/25/95 - <b>Slice No. 11</b>							
P-118	CT scans of Jose Rodriguez's head dated 8/28/95							



**EXHIBIT P-1**

**PLAINTIFF'S EXHIBIT LIST**

*Rodriguez v. Riddell Sports, Inc., et al.*

NO	DESCRIPTION	DATE	WITNESSES	MARKED FOR ID	OFFERED	ADMITTED	CONDITIONALLY	
							ADMITTED	DENIED
P-118A	Selected Enlargement of CT scans of Jose Rodriguez's head dated 8/28/95 - <b>Slice No. 9</b>							
P-118B	Selected Enlargement of CT scans of Jose Rodriguez's head dated 8/28/95 - <b>Slice No. 10</b>							
P-118C	Selected Enlargement of CT scans of Jose Rodriguez's head dated 8/28/95 - <b>Slice No. 11</b>							
P-119	Article entitled "The National Traumatic Coma Data Bank Part 2: Patients who talk and deteriorate: Implications for treatment," by Lawrence F. Marshall, M.D., et al.							
P-120	Article entitled "Neuropathological Sequelae of Traumatic Brain Injury: Relationship to Neurochemical and Biomechanical Mechanisms," by Tracy K. McIntosh, et al.							
P-121	Article entitled "Patients With Head Injury Who Talk and Die," by Peter L. Reilly, et al.							
P-122	Article entitled "Diffuse Axonal Injury Due to Nonmissile Head Injury in Humans: An Analysis of 45 Cases," by J. Hume Adams, FRCPath, et al.							
P-123	Article entitled: "Computed Tomography of Post-traumatic Extracerebral Hematomas: Comparison to Pathophysiology and Responses to Therapy," by Carol							

**EXHIBIT P-1**

**PLAINTIFF'S EXHIBIT LIST**

*Rodriguez v. Riddell Sports, Inc., et al.*

NO	DESCRIPTION	DATE	WITNESSES	MARKED FOR ID	OFFERED	ADMITTED	CONDIT'LY	
							ADMITTED	DENIED
	A. Dolinskas, M.D., et al.							
P-124	Article entitled "An Evaluation of Football Helmets Under Impact Conditions," by Bishop, et al. American Journal of Sports Medicine, Vol. 12, No. 3 (1984)							
P-125	Article entitled "Biomechanics of Head Injury," by Thomas A. Gennarelli, et al.							
P-126	Article entitled "Biomechanics of Acute Subdural Hematoma," by Thomas A. Gennarelli, M.D., et al.							
P-127	Article entitled "Head Injury in Man and Experimental Animals: Neuropathology," by J. H. Adams, et al.							
P-128	Article entitled "Head Injury in Man and Experimental Animals: Clinical Aspects," by T. A. Gennarelli.							
P-129	Article entitled "Diffuse axonal injury in head injury: definition, diagnosis and grading," by J. Hume Adams, et al.							
P-130	Article entitled "Mechanisms of Non-Penetrating Head Injury," by D.I. Graham, et al.							
P-131	Article entitled "Epidural Hematoma and Diffuse Axonal Injury," by J. Sahuguillo-Barris, et al.							
P-132	Article entitled "The Nature, Distribution and Causes of Traumatic Brain Injury," by D. I. Graham, et al.							



**EXHIBIT P-1**

**PLAINTIFF'S EXHIBIT LIST**

*Rodriguez v. Riddell Sports, Inc., et al.*

NO	DESCRIPTION	DATE	WITNESSES	MARKED FOR ID	OFFERED	ADMITTED	CONDITIONALLY	
							ADMITTED	DENIED
P-133	Article entitled "Concussion Incidences and Severity in Secondary School Varsity Football Players," by Susan Goodwin Gerberich, Ph.D., RN.							
P-134	Article entitled "Management Guidelines for Head Injuries in Athletics," by Leonard A. Bruno, M.D., FACS.							
P-135	Article entitled "Severe head injuries in three countries," by B. Jennett, et al.							
P-136	Article entitled "Second impact syndrome," by Paul R. McCrory, FRACP, FACSM, et al.							
P-137	Article entitled "Quantification of Primary and Secondary Lesions in Severe Head Injury," by D.I. Graham, et al.							
P-138	Article entitled "Diffuse Axonal Injury and Traumatic Coma in the Primate," by Thomas A. Gennarelli, M.D.							
P-139	Article entitled "Analysis of Management in Thirty-three Closed Head Injury Patients Who 'Talked and Deteriorated,'" by Gaylan L. Rockswold, M.D., et al.							
P-140	Article entitled "Axonal injury: a universal consequence of fatal closed head injury?" by S.M. Gentleman, et al.							
P-141	Article entitled "Biomechanical Aspects of Head Injuries in Sports," by Ayub K. Ommaya							

**EXHIBIT P-1**

**PLAINTIFF'S EXHIBIT LIST**

***Rodriguez v. Riddell Sports, Inc., et al.***

NO.	DESCRIPTION	DATE	WITNESSES	MARKED FOR ID	OFFERED	ADMITTED	CONDIT'L Y	
							ADMITTED	DENIED
P-142	Article entitled "Acute subdural hematoma and diffuse axonal injury after severe head trauma," Juan Sahuquillo-Barris, M.D., et al.							
P-143	Article entitled "Head Injured Patients Who Talk Before Deterioration or Death: The TADD Syndrome," by Ayub K. Ommaya, et al.							
P-144	Article entitled "Diffuse axonal injury in non-missile head injury," by J. Hume Adams, et al.							
P-145	"Head Injury," by Paul R. Cooper, M.D., article entitled "Cerebral Concussion and Diffuse Brain Injuries, ." by Thomas A. Gennarelli.							
P-146	Article entitled "An Evaluation of Football Helmets Under Impact Conditions," by Patrick J. Bishop, Ph.D., et al., University of Waterloo, Waterloo, Ontario, Canada							
P-147	Article entitled "Head Injury Mechanisms and the Concept of Preventive Management: A Review and Critical Synthesis," by Ayub K. Ommaya							
P-148	Article entitled "Impact Standards for Protective Equipment," by Voigt R. Hodgson							
P-149	Article entitled "Injury Risk Curves for Children and Adults in Frontal and Rear Collisions," by Harold J. Mertz, et al.							



**EXHIBIT P-1**  
**PLAINTIFF'S EXHIBIT LIST**

*Rodriguez v. Riddell Sports, Inc., et al.*

NO	DESCRIPTION	MARKED FOR ID					CONDITIONALLY ADMITTED		DENIED
		DATE	WITNESSES	OFFERED	ADMITTED	CONDIT'LY ADMITTED			
P-150	Index of medical bills incurred by Jose Rodriguez - indexed by provider and amount, including certification from record custodian								
P-151A	Supplemental index of medical bills incurred by Jose Rodriguez - indexed by provider and amount, including certification from record custodian								
P-151B	Supplemental index of medical bill payments - dated 11/195 through 10/30/97.								
P-152	Receipts for Modification to Rodriguez Home								
P-153A	Pictures of Jose Rodriguez Before Injury								
P-153B	Pictures of Jose Rodriguez After Injury								
P-154	Jose Rodriguez' Los Fresnos High School Transcript								
P-155	Essay drafted by Jose Rodriguez before injury re: life goals								
P-156	Los Fresnos High School Graduation Commencement Program - 1996								
P-157	Jose Rodriguez Day in the Life Videotape Film (edited)								
P-158	Letter from Dr. Ruiz re: Jose Rodriguez's graduation								
P-159	Curriculum vitae of Dr. Fred Bass								

**EXHIBIT P-1**

**PLAINTIFF'S EXHIBIT LIST**

*Rodriguez v. Riddell Sports, Inc., et al.*

NO	DESCRIPTION	DATE	WITNESSES	MARKED FOR ID	OFFERED	ADMITTED	CONDITIONALLY	
							ADMITTED	DENIED
P-160	Dr. Fred Bass Financial Report							
P-161	Curriculum vitae of Dr. Cassidy							
P-162	Report dated 12/15/98 of Dr. Cassidy							
P-163	Supplemental Report of Dr. Cassidy re: Jose Rodriguez's life expectancy							
P-164	Curriculum vitae of Dr. Goka							
P-165A	Jose Rodriguez Life Care Plan prepared by Dr. Goka							
P-165B	Independent Medical Exam by Dr. Goka - dated 1/31/98							
P-165C	Supplemental Report by Dr. Goka - dated 1/31/98							
P-165D	Supplemental Report by Dr. Goka - dated 2/5/98							
P-166	Curriculum vitae of Dr. Richard Rubenstein							
P-167	Curriculum vitae of Dr. Richard Stalnaker (Rev. 10/3/97)							
P-168	Curriculum vitae of Dr. Gary Stimac							
P-169	Curriculum vitae of Emma Vasquez							
P-170	Emma Vasquez Vocational Report							
P-171	Curriculum vitae of Dr. John White							



**EXHIBIT P-1**

**PLAINTIFF'S EXHIBIT LIST**

*Rodriguez v. Riddell Sports, Inc., et al.*

NO	DESCRIPTION	DATE	WITNESSES	MARKED FOR ID	OFFERED	ADMITTED	CONDIT'LY ADMITTED	DENIED

P-172	Annual Report - Riddell, Inc. (1997 - 10K)							
P-173	Shareholder's Report - 1994							
P-174A	Illustration of Intermediate Size Helmet Shells							
P-174B	Illustration of Intermediate Size Helmet Shells							
P-174C	Illustration of Intermediate Size Helmet Shells							
P-174D	Illustration of Intermediate Size Helmet Shells							
P-174E	Illustration of Intermediate Size Helmet Shells							
P-174F	Illustration of Intermediate Size Helmet Shells							
	<b><u>RESERVED (IMPEACHMENT)</u></b>							
P-175								
P-176								
P-177								
P-178								
P-179								
P-180								
P-181								

**EXHIBIT P-1**

**PLAINTIFF'S EXHIBIT LIST**

*Rodriguez v. Riddell Sports, Inc., et al.*

NO	DESCRIPTION	MARKED FOR ID						CONDITIONALLY		DENIED
		DATE	WITNESSES	OFFERED	ADMITTED	ADMITTED	OFFERED	ADMITTED	ADMITTED	

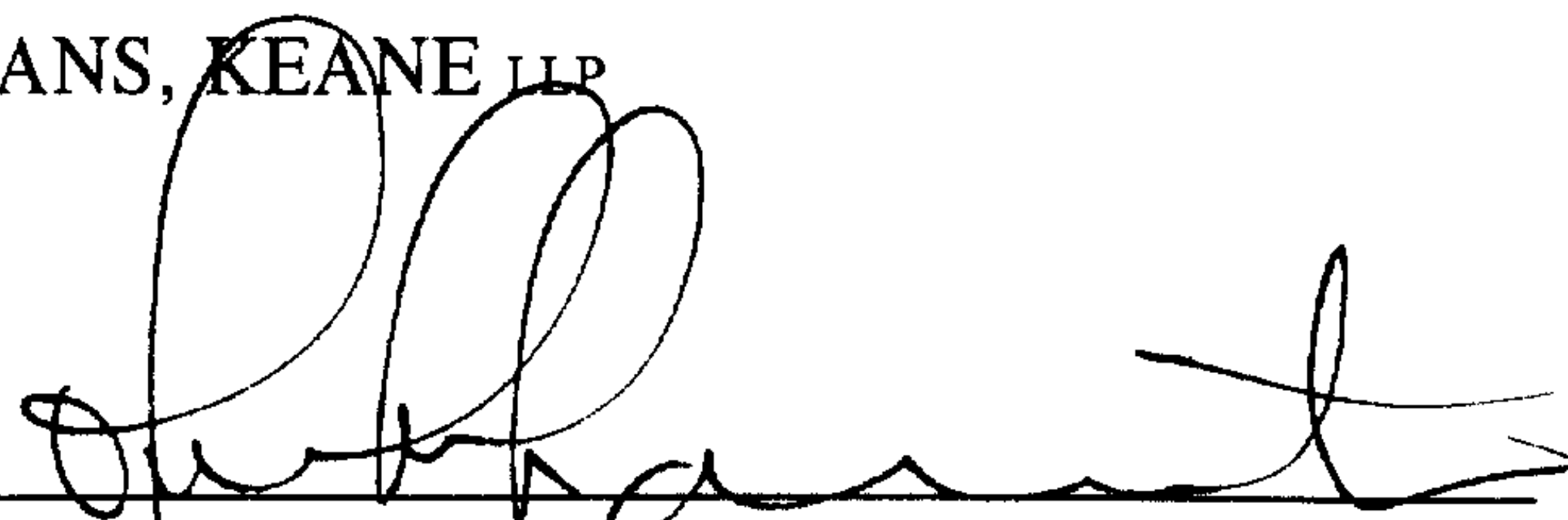
P-182										
P-183										
P-184										



DATED this 24 day of April, 2001.

EVANS, KEANE LLP

By

A handwritten signature in black ink, appearing to read 'Rex Blackburn', is written over a horizontal line.

Rex Blackburn

State Bar No. 3170

Paul J. Augustine

State Bar No. 4608

EVANS, KEANE LLP

1101 W. River Street, Suite 200

P. O. Box 959

Boise, Idaho 83701-0959

Telephone: (208) 384-1800

Facsimile: (208) 345-3514

Mark D. Kamitomo

State Bar No. 18803

THE MARKAM GROUP, INC., P.S.

421 West Riverside, Suite 1060

Spokane, Washington 99201

Telephone: (509) 747-0902

Facsimile: (509) 747-1993

J. Arnold Aguilar

State Bar No. 00936270

Federal ID. No. 6822

Artemis Square, Suite H-2

1200 Central Boulevard

Brownsville, Texas 78520

Telephone: (956) 504-1100

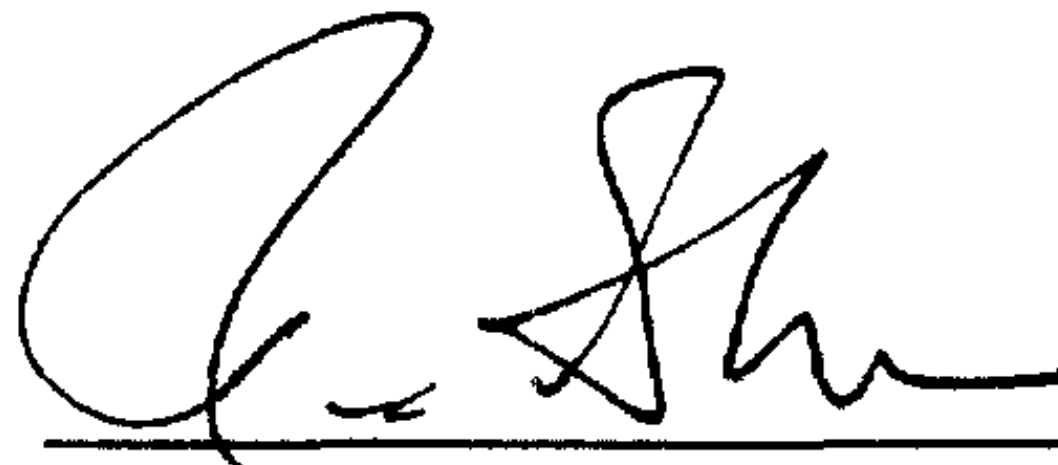
Facsimile: (956) 504-1408

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 24<sup>th</sup> day of April, 2001, a true and correct copy of the foregoing document was served by first-class mail, postage prepaid, and addressed to; by fax transmission to; by overnight delivery to; or by personally delivering to or leaving with a person in charge of the office as indicated below:

Robert Summers  
ROBERT B. SUMMERS & ASSOCIATES  
P.O. Box 398  
Llano, TX 78643

☐ U.S. Mail  
☒ Facsimile (915) 248-0110  
☐ Overnight Delivery  
☐ Messenger Delivery



---

Rex Blackburn



**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
BROWNSVILLE DIVISION**

**RAQUEL O. RODRIGUEZ as legal  
guardian of JOSE L. RODRIGUEZ,**

**Plaintiff,**

**vs.**

**RIDDELL INC., ALL AMERICAN  
SPORTS CORPORATION  
d/b/a RIDDELL/ALL AMERICAN,**

**Defendants.**

**Case No. B-CV-96-177**

**EXHIBIT P-2 TO PLAINTIFF'S PROPOSED PRE-TRIAL ORDER**

**PLAINTIFF'S WITNESS LIST**

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Plaintiff may call any of the persons identified below as witnesses at trial of the above-referenced matter. Plaintiff reserves the right to decline to call as witnesses any of the following persons, and make no representation that any of them will be present at the trial of this matter. Plaintiff also reserves the right to make substitutions, additions or withdrawals with regard to this list of potential witnesses, with notice to the Court and Counsel. Plaintiff also reserves the right to call as witnesses all persons named by Defendants as factual and expert witnesses.



1. **LAY WITNESSES:** The following individuals may testify as lay witnesses:

(a) **Jesus Amaya**, Los Fresnos High School, 1-1/4 Mile Farm Road 1847, Los Fresnos, TX 78566. Mr. Amaya was the coach at Los Fresnos during the scrimmage with Santa Rosa. He will testify about the football program at Los Fresnos, his observations during the scrimmage, and chain of custody of Jose's helmet.

(b) **Eddie Barrera**, 215 Dodds, Los Fresnos, TX 78566. Mr. Barrera was a friend and teammate of Jose Rodriguez. He will testify about his observations of Jose Rodriguez during the scrimmage and after Jose Rodriguez's injury.

(c) **Walker Raymond Cash, Jr.**, Rubatex Corporation, P.O. Box 340, Bedford, VA 24523. Mr. Cash is a representative of Rubatex, the company that manufactured the foam used in Jose Rodriguez's helmet. Plaintiffs will use his deposition testimony in this case.

(d) **Danny Diaz**, Route 2, Box 411, Rio Hondo, TX 78583. Mr. Diaz was a friend and teammate of Jose Rodriguez. He will testify about his observations of Jose Rodriguez during the scrimmage and after Jose Rodriguez's injury.

(e) **Leonel Garza**, Los Fresnos Independent School District, P.O. Box 309, Los Fresnos, TX 78566. Mr. Garza was an assistant coach at Los Fresnos High School in August of 1995. He will testify about his observations of Jose Rodriguez during the scrimmage and chain of custody of Jose's helmet.

(f) **Diana Rodriguez Gomez**, 500 Camino Del Rey, San Benito, TX 78586. Ms. Gomez is Jose's sister and she will testify about Jose's condition prior to and after his accident. She will testify about the effect of Jose's injury on herself and her family. She will also testify about Jose's care after his injury.

(g) **Ralph Infusino**, Riddell Sports, Inc., 3670 N. Milwaukee Ave., Chicago, IL. Mr. Infusino is an employee at Riddell and the co-designer of the VSR-4 helmet. Plaintiffs will use portions of the deposition testimony of Mr. Infusino in the case of *Whitehead v. Riddell*, Case No. 90-08-13990 CCCV, in the District Court of Comanche County, Texas, relating to his participation in the design of helmets at Riddell.

(h) **Nelson Kraemer**, Riddell Representative, Riddell Sports, Inc., 3670 N. Milwaukee Ave., Chicago, IL. Mr. Kraemer is an employee at Riddell and the co-designer of the VSR-4 helmet. Plaintiffs will use the deposition testimony of Mr. Kraemer as it relates to his participation in the design of helmets at Riddell.



(i) **Dan Kult**, Riddell Representative, Riddell Sports, Inc., 3670 N. Milwaukee Ave., Chicago, IL. Mr. Kult is a chemical engineer at Riddell. Plaintiffs will use the deposition of Mr. Kult and/or his trial testimony from the previous trial as it relates to his participation in the design and testing of helmets at Riddell.

(j) **Fernanda Lopes**, 5374 Maple Vista, San Antonio, TX 78247. Ms. Lopes was the student trainer/water person for Los Fresnos High School. Ms. Lopes will testify as to Jose Rodriguez's physical and mental condition before and after the scrimmage.

(k) **Juan N. Rodriguez**, 201 Limon Drive, San Benito, TX 78586. Mr. Rodriguez is Jose's brother and he will testify about Jose's condition prior to and after his accident. He will testify about the effect of Jose's injury on himself and his family. He will also testify about Jose's care after his injury.

(l) **Raquel O. Rodriguez**, 201 Limon, San Benito, TX 78586. Ms. Rodriguez is Jose's mother and will testify about Jose's condition prior to and after his accident. She will also testify about the effect of Jose's injury on herself and her family. She will also testify about Jose's care after his injury.

(m) **Maria Del Carmen Torres**, 1185 Bowie Drive, Brownsville, TX 78521. Ms. Torres is Jose's sister and she will testify about Jose's condition prior to and after his accident. She will testify about the effect of Jose's injury on herself and her family. She will also testify about Jose's care after his injury.

(n) **Guille Gonzalez**, Wyatt & Wyatt, 4825 Everhart Rd. #1 Corpus Christi, TX, Mr. Gonzales is an investigator with the firm of Wyatt & Wyatt. Mr. Gonzalez will testify as to his possession of Joe Rodriguez's VSR-4 football helmet.

2. **EXPERTS:** The following individuals may testify, consistent with their deposition testimony and/or their reports, concerning their expert opinions:

(a) **Frederick Bass, F.S.A.**, Bass Consultants, Inc., One Greenway Plaza, Suite 600, Houston, TX 77046, will testify about Jose Rodriguez's loss of earning and future earning capacity consistent with his written report.

(b) **John W. Cassidy, M.D.**, 25211 Grogan's Mill Road, Suite 200, The Woodlands, TX 77380. John W. Cassidy, M.D. will testify concerning Jose Rodriguez's neuropsychiatric evaluation, the reasonableness and necessity of the medical expenses, and Jose Rodriguez's life expectancy consistent with his written reports.



(c) **Richard S. Goka, M.D.**, Physical Medicine and Rehabilitation, 5740 North Palm Avenue, Suite 103, Fresno, CA 93704. Dr. Goka will testify concerning Jose Rodriguez's Life Care Plan, consistent with his written reports.

(d) **Richard A. Rubenstein, M.D.**, The Medical Center, 2970 Hilltop Mall Road, Suite 203, Richmond, CA 94806-1947. Dr. Rubenstein will testify regarding the nature, extent and cause of Plaintiff's injuries.

(e) **Richard L. Stalnaker, Ph.D.**, Ristal Engineering, Inc., 8337 Martinsburg Road, Mount Vernon, OH 43050. Dr. Stalnaker will testify concerning liability, including, but not limited to product defect and causation issues consistent with his deposition testimony.

(f) **Gary K. Stimac, M.D.**, Imaging Network of Seattle, 12600 SE 38<sup>th</sup> Street, Suite 200, Bellevue, WA 98006. Dr. Stimac will testify regarding the nature, extent and cause of Plaintiff's injuries.

(g) **John D. White, M.D.**, 8269 Jordan St. S.E., Salem, OR 97301-9146. Dr. White will testify regarding the nature, extent and cause of Plaintiff's injuries.

(h) **Emma Y. Vasquez**, 10850 Richmond Avenue, Suite #340, Houston, TX 77042, will testify concerning on vocational issues consistent with her written report.

(i) See **Exhibit P-5** attached hereto containing the Curriculum Vitae for Drs. Rubenstein, Stalnaker, Stimac, White, Goka, Cassidy, and Mr. Bass and Ms. Vasquez, setting forth each of their qualifications.

3. **SUPPLEMENTAL WITNESSES:** If other witnesses to be called at the trial become known, their names, addresses, and subject of their testimony will be reported to opposing counsel in writing as soon as they are known; this does not apply to rebuttal or impeachment witnesses.



DATED this 24 day of April, 2001.

EVANS, KEANE LLP

By

  
Rex Blackburn

State Bar No. 3170

Paul J. Augustine

State Bar No. 4608

EVANS, KEANE LLP

1101 W. River Street, Suite 200

P. O. Box 959

Boise, Idaho 83701-0959

Telephone: (208) 384-1800

Facsimile: (208) 345-3514

Mark D. Kamitomo

State Bar No. 18803

THE MARKAM GROUP, INC., P.S.

421 West Riverside, Suite 1060

Spokane, Washington 99201

Telephone: (509) 747-0902

Facsimile: (509) 747-1993

J. Arnold Aguilar

State Bar No. 00936270

Federal ID. No. 6822

Artemis Square, Suite H-2

1200 Central Boulevard

Brownsville, Texas 78520

Telephone: (956) 504-1100

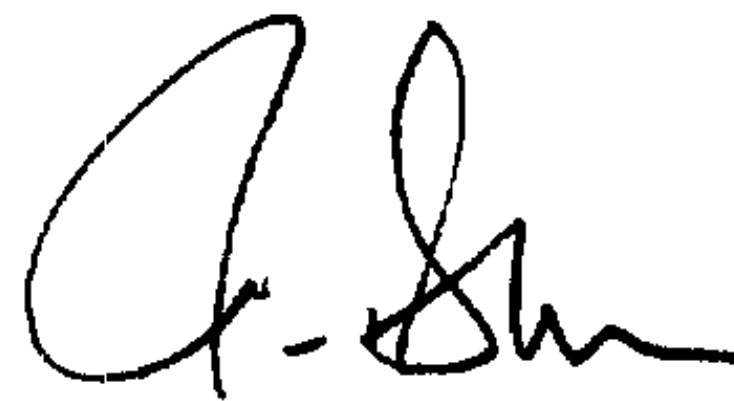
Facsimile: (956) 504-1408

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 24<sup>th</sup> day of April, 2001, a true and correct copy of the foregoing document was served by first-class mail, postage prepaid, and addressed to; by fax transmission to; by overnight delivery to; or by personally delivering to or leaving with a person in charge of the office as indicated below:

Robert Summers  
ROBERT B. SUMMERS & ASSOCIATES  
P.O. Box 398  
Llano, TX 78643

☐ U.S. Mail  
☒ Facsimile (915) 248-0110  
☐ Overnight Delivery  
☐ Messenger Delivery



\_\_\_\_\_  
Rex Blackburn



**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
BROWNSVILLE DIVISION**

**RAQUEL O. RODRIGUEZ as legal  
guardian of JOSE L. RODRIGUEZ,**

**Plaintiff,**

**VS.**

**RIDDELL INC.; ALL AMERICAN  
SPORTS CORPORATION  
d/b/a RIDDELL/ALL AMERICAN,**

**Defendants.**

**Case No. B-CV-96-177**

**EXHIBIT P-3 TO PLAINTIFF'S  
PROPOSED PRETRIAL ORDER**

**PLAINTIFF'S PROPOSED VOIR DIRE QUESTIONS**

---

1. Are you familiar with any of the following parties in this case, and if so, please explain:

Raquel O. Rodriguez

Jose L. Rodriguez

Riddell, Inc.

All American Sports Corporation dba Riddell/All American

2. Are you familiar with any of the following attorneys in this case, and if so, please explain:

J. Arnold Aguilar  
Rex Blackburn  
Paul J. Augustine  
Mark Kamitomo  
Robert Summers

3. Are you familiar with any of the following witnesses in this case, and if so, please explain:

**Lay Witnesses for the Plaintiff:**

Jesus Amaya  
Eddie Barrera  
Walker Raymond Cash, Jr.  
Danny Diaz  
Leonel Garza  
Diana Rodriguez Gomez  
Ralph Inusino  
Nelson Kraemer  
Fernanda Lopes  
Juan N. Rodriguez  
Raquel O. Rodriguez  
Maria Del Carmen Torres  
Eliseo Ruiz, Jr.  
Guile Gonzalez

**Expert Witnesses for the Plaintiff:**

Frederick Bass  
John W. Cassidy, M.D.  
Richard S. Goka, M.D.  
Richard A. Rubenstein, M.D.  
Richard L. Stalnaker, Ph.D.  
Gary K. Stimac, M.D.  
John D. White, M.D.  
Emma Y. Vasquez

**For the Defendant:**

Kenneth Clarke, Ph.D.  
Thomas A. Gennarelli, M.D.



A. R. Garza-Vale, M.D.  
Dave Halstead  
Dan Kult  
Nelson Kraemer  
James McElhaney, Ph.D.  
Ayub K. Ommaya, M.D.  
Walt Reed, Ph.D.

### **PRIOR JURY SERVICE**

4. Have you ever served on a jury before?
  - a. Was it a civil or criminal jury?
  - b. Did it involve a claim of personal injury?
  - c. Did you experience as a juror affect your beliefs or attitudes in a way that will affect your deliberations in this case?

### **EXPERIENCES WITH SPORTING EQUIPMENT**

5. Have you, or any of your family members, or close friends ever suffered an injury associated with the use of any sporting equipment?
  - a. Who suffered it?
  - b. What sporting equipment?
  - c. How did the injury occur?
  - d. Did the experience affect your beliefs or attitudes regarding the safety of the sporting equipment?
  - e. Did the experience affect your beliefs or attitudes about sporting equipment generally?

## **SPORTING GOODS MANUFACTURERS**

6. Do you hold any beliefs or attitudes about the safety or efficiency of sporting goods, especially football helmets?

- a. What beliefs or attitudes?
- b. What experience(s) have shaped those beliefs or attitudes?

## **PRODUCT SAFETY**

7. Do you hold any beliefs or attitudes regarding a manufacturer's responsibility to design safe products?

- a. What beliefs or attitudes?
- b. What experience(s) have shaped those beliefs or attitudes?

8. Do you hold any beliefs or attitudes about a manufacturer's responsibility to test products for safety before those products are made available to the public?

- a. What beliefs or attitudes?
- b. What experience(s) have shaped those beliefs or attitudes?

9. Do you hold any beliefs or attitudes about whether a manufacturer should use the best available materials when producing protective headgear, such as a football helmet?

10. Do you hold any beliefs or attitudes about whether a manufacturer of a product intended to protect its users from personal injury holds a special responsibility in designing and testing its products?

## **FOOTBALL**

11. Do you hold any belief or attitude about the sport of football that will affect your deliberation in this case?

PLAINTIFF'S PROPOSED VOIR DIRE QUESTIONS - 4



- a. What beliefs or attitude?
- b. What experience(s) have shaped those beliefs?
- c. Any family members or close acquaintances play football? If so, who?
- d. Have any of those people been injured playing football? Please explain.

12. Do you believe that football helmets should be designed to protect players from most types of head injury?

13. Do you believe that football, because of its physical nature, is the type of sport in which injury cannot be prevented or protected, and will this belief or attitude affect your deliberations in this case?

- a. What beliefs or attitudes?
- b. What experience(s) have shaped those beliefs or attitudes?

### **LAWSUITS**

14. Do you hold any beliefs or attitudes about our legal system, generally, or lawsuits, in particular, that will affect your deliberations in this case?

- a. What beliefs or attitudes?
- b. What experience(s) have shaped those beliefs or attitudes?

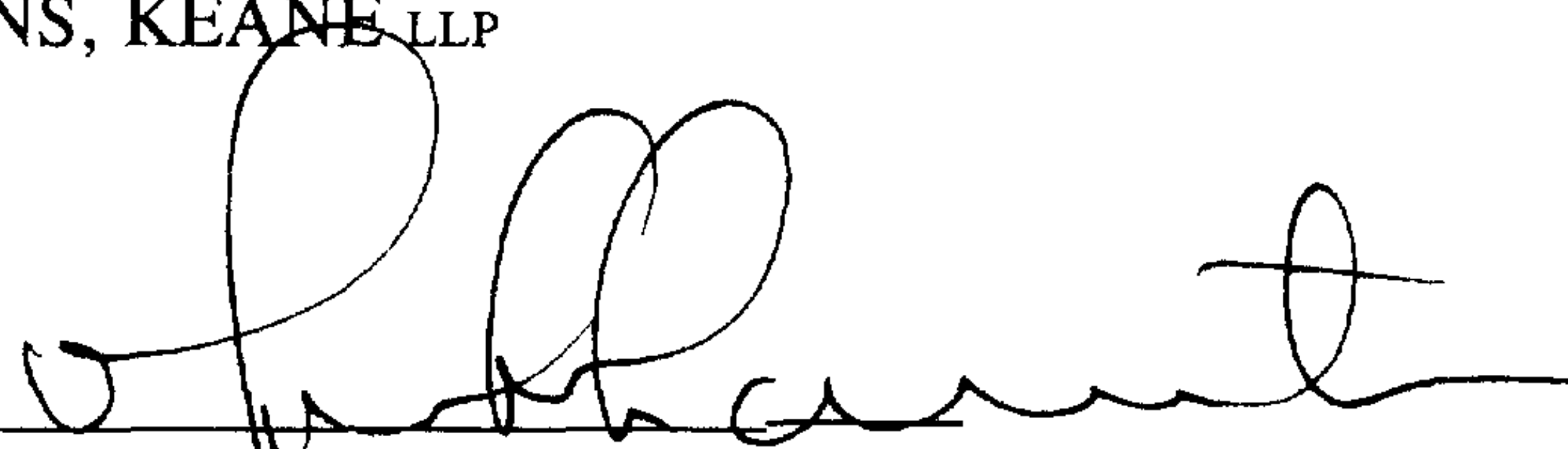
15. Do you hold any beliefs or attitudes about awarding money as compensation for personal injuries, that will affect your deliberations in this case?

- a. What beliefs or attitudes?
- b. What experience(s) have shaped those beliefs or attitudes?

DATED this 24 day of April, 2001.

EVANS, KEANE LLP

By

A handwritten signature in black ink, appearing to read 'Rex Blackburn', written over a horizontal line.

Rex Blackburn

State Bar No.3170

Paul J. Augustine

State Bar No. 4608

EVANS, KEANE LLP

1101 W. River Street, Suite 200

P. O. Box 959

Boise, Idaho 83701-0959

Telephone: (208) 384-1800

Facsimile: (208) 345-3514

Mark D. Kamitomo

State Bar No. 18803

THE MARKAM GROUP, INC., P.S.

421 West Riverside, Suite 1060

Spokane, Washington 99201

Telephone: (509) 747-0902

Facsimile: (509) 747-1993

J. Arnold Aguilar

State Bar No. 00936270

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Artemis Square, Suite H-2

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Brownsville, Texas 78520

Telephone: (956) 504-1100

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**CERTIFICATE OF SERVICE**

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---

Rex Blackburn

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
BROWNSVILLE DIVISION**

**RAQUEL O. RODRIGUEZ as legal guard-  
ian of JOSE L. RODRIGUEZ,**

**Plaintiff,**

**VS.**

**RIDDELL, INC., ALL AMERICAN  
SPORTS CORPORATION  
d/b/a RIDDELL/ALL AMERICAN,**

**Defendants.**

Case No. B-CV-96-177

**EXHIBIT P-4 TO PLAINTIFF'S PROPOSED PRETRIAL ORDER**

**NOTICE TO THE COURT ON PLAINTIFF'S  
PROPOSED JURY CHARGE AND SPECIAL INTERROGATORIES**

Plaintiff reserves the right to supplement and amend their proposed jury charges.



You will recall that during the course of this trial I instructed you that certain testimony and certain exhibits were admitted into evidence for a limited purpose and I instructed you that you may consider some documents as evidence against one party but not against another. You may consider such evidence only for the specific limited purposes for which it was admitted.

In determining the weight to give to the testimony of a witness, you may consider whether there was evidence tending to prove that the witness testified falsely concerning some important fact, or whether there was evidence that at some other time the witness said or did something, or failed to say or do something, that was different from the testimony the witness gave before you during the trial.

You should keep in mind, of course, that a simple mistake by a witness does not necessarily mean that the witness was not telling the truth as he or she remembers it, because people may forget some things or remember other things inaccurately. So, if a witness has made a misstatement, you need to consider whether the misstatement was an intentional falsehood or simply an innocent lapse of memory; and the significance of that may depend on whether it has to do with an important fact or with only an unimportant detail.

While you should consider only the evidence in this case, you are permitted to draw such reasonable inferences from the testimony and exhibits as you feel are justified in the light of common experience. In other words, you may make deductions and reach conclusions that reason and common sense lead you to draw from the facts that have been established by the testimony and evidence in the case.

The testimony of a single witness may be sufficient to prove any fact, even if a greater number of witnesses may have testified to the contrary, if after considering all the other evidence you believe that single witness.



There are two types of evidence that you may consider in properly finding the truth as to the facts in the case. One is direct evidence - such as testimony of an eyewitness. The other is indirect or circumstantial evidence - the proof of a chain of circumstances that indicates the existence or nonexistence of certain other facts. As a general rule, the law makes no distinction between direct or circumstantial evidence, but simply requires that you find the facts from a preponderance of all the evidence, both direct and circumstantial.

When knowledge of technical subject matter may be helpful to the jury, a person who has special training or experience in that technical field - he is called an expert witness - is permitted to state his opinion on those technical matters. However, you are not required to accept that opinion. As with any other witness, it is up to you to decide whether to rely upon it.

In deciding whether to accept or rely upon the opinion of an expert witness, you may consider any bias of the witness, including any bias you may infer from evidence that the expert witness has been or will be paid for reviewing the case and testifying, or from evidence that he testifies regularly as a expert witness and has income from such testimony which represents a significant portion of his income.

Any notes that you have taken during this trial are only aids to memory. If your memory should defer from your notes, then you should rely on your memory and not on the notes. The notes are not evidence. A juror who has not taken notes should rely on his or her independent recollection of the evidence and should not be unduly influenced by the notes of other jurors. Notes are not entitled to any greater weight than the recollection or impression of each juror about the testimony.



## Parties' Claims

Plaintiff claims that on August 24, 1995, Jose Rodriguez suffered permanent brain injury when his Riddell VSR-4 football helmet, designed, manufactured, tested and marketed by Riddell, Inc. and recertified by Riddell All American, failed to properly absorb and distribute the energy of a predictable impact he received to the side of his helmet during a football scrimmage. The Plaintiff contends that Jose Rodriguez' VSR-4 football helmet was defective and unreasonably dangerous due to its defective design. Plaintiff claims that an alternative design and materials were available to Riddell, Inc. which would have made the helmet worn by Jose Rodriguez safer and would have likely prevented his injuries. Plaintiff contends that the configuration and type of padding in the VSR-4 football helmet worn by Jose did not adequately protect him from reasonably foreseeable blows to the side of the helmet. Plaintiff further contends that the VSR-4 football helmet worn by Jose Rodriguez was negligently designed and tested because it did not perform its primary function, that is, to properly absorb and distribute the energy of a predictable impact so as to avoid a brain injury to its users. Rather, the Plaintiff contends that the design of the helmet permitted an unreasonably dangerous level of force to be delivered directly to Jose Rodriguez' skull, which resulted in a permanent brain injury.

The Plaintiff also claims that the Defendants used padding in Jose Rodriguez' helmet which they knew was inadequate and inferior to other pads available for use in football helmets at the time it was sold and recertified. Plaintiff contends that Defendants use of this inadequate padding constitute gross negligence and entitles them to punitive damages. Finally, Plaintiff alleges that the VSR-4 helmet supplied by Riddell, Inc. to Jose Rodriguez was unfit for the ordinary purposes for which such football helmets are used because of its defective design.

Plaintiff claims that as a result of Defendants' actions, Jose Rodriguez has sustained a permanent brain injury which will require 24-hour medical treatment and care for the rest of his life and prevent him from engaging in a productive life. Plaintiff also alleges that they have incurred medical expenses and other costs associated with the care and treatment of Jose Rodriguez.

Riddell Inc. denies that its VSR-4 football helmet was a cause of Jose Rodriguez' injuries. Defendants contend that no football helmet would have been able to protect Jose Rodriguez from the injuries that he suffered.

### **PLAINTIFFS' REQUESTED SPECIAL INSTRUCTION NO. 1**

“Negligence” means failure to use ordinary care, that is, failing to do that which a person of ordinary prudence would have done under the same or similar circumstances or doing that which a person of ordinary prudence would not have done under the same or similar circumstances.

“Ordinary care” means that degree of care that would be used by a person of ordinary prudence under the same or similar circumstances.



## **PLAINTIFFS' REQUESTED SPECIAL INSTRUCTION NO. 2**

“Producing cause” means an efficient, exciting, or contributing cause that, in a natural sequence, produces the injury. There may be more than one producing cause.

PJC 70.1

### **PLAINTIFFS' REQUESTED SPECIAL INSTRUCTION NO. 3**

“Proximate cause” means that cause which, in a natural and continuous sequence, produces an event, and without which cause such event would not have occurred. In order to be a proximate cause, the act or omission complained of must be such that a person using ordinary care would have foreseen that the event, or some similar event, might reasonably result therefrom. There may be more than one proximate cause of an event.



**QUESTION 1:**

Was there a design defect in the VSR-4 football helmet at the time it left the possession of Riddell, Inc. that was a producing cause of the injury in question?

A “design defect” is a condition of the product that renders it unreasonably dangerous as designed, taking into consideration the utility of the product and the risk involved in its use. For a design defect to exist there must have been a safer alternative design.

“Safer alternative design” means a product design other than the one actually used that in reasonable probability—

(1) would have prevented or significantly reduced the risk of the injury in question without substantially impairing the product’s utility and

(2) was economically and technologically feasible at the time the product left the control of Defendants by the application of existing or reasonably achievable scientific knowledge.

ANSWER “Yes” or “No.”

ANSWER: \_\_\_\_\_

**Go to Question 2.**

**QUESTION 2:**

Was the VSR-4 football helmet supplied by Riddell, Inc. unfit for the ordinary purposes for which such football helmets are used because of a defect, and, if so, was such unfit condition a proximate cause of the injury in question?

A “defect” means a condition of the goods and renders them unfit for the ordinary purposes for which they are used because of a lack of something necessary for adequacy.

ANSWER “Yes” or “No.”

ANSWER: \_\_\_\_\_

**Go to Question 3.**



**QUESTION 3:**

Did the negligence, if any, of the persons named below proximately cause the injury to Plaintiff?

Answer "Yes" or "No" for each of the following:

- a. Riddell, Inc. \_\_\_\_\_
- b. All American Corp.,  
d/b/a Riddell/All American \_\_\_\_\_

**If you answered "Yes" to any part of Question 3, go to Question 4. If you answered "No" to all parts of Question 3, go to Question 5.**

**QUESTION 4:**

Was the negligence of any of the persons named below “gross negligence”?

“Gross negligence” means more than momentary thoughtlessness, inadvertence, or error of judgment. It means such an entire want of care as to establish that the act or omission in question was the result of actual conscious indifference to the rights, welfare, or safety of the persons affected by it.

Answer “Yes” or “No” for each of the following:

- a. Riddell, Inc. \_\_\_\_\_
- b. All American Corp.,  
d/b/a Riddell/All American \_\_\_\_\_

**Go to Question 6.**



If you have answered "Yes" to any part of Question 1, 2, or 3, then answer Question 5. If you answered "No" to all of Questions 1, 2, and 3, do not answer any of Questions 6, 7, and 8.

The percentages you find must total 100 percent. The percentages must be expressed in whole numbers. The percentage of causation attributable to a person or product is not necessarily measured by the number of acts, omissions, or product defects found. The percentage attributable to a person need not be the same percentage attributed to that person in answering another question.

**QUESTION 5:**

For each person or product found by you to have caused the injuries to plaintiff, find the percentage caused by:

a.	Riddell, Inc.	_____
b.	All American Corp., d/b/a Riddell/All American	_____
	<u>Total</u>	_____ 100 _____ %

#### **PLAINTIFF'S REQUESTED SPECIAL INSTRUCTION NO. 4**

If you find that either of the Defendants are liable to the Plaintiff, then you must determine an amount that is fair compensation for all of the Plaintiff's damages. These damages are called compensatory damages. The purpose of compensatory damages is to make the Plaintiff whole—that is, to compensate the Plaintiff for the damage that the Plaintiff has suffered.

You may award compensatory damages only for injuries that the Plaintiff proves were proximately caused by the Defendants' allegedly wrongful conduct. The damages that you award must be fair compensation for all of the Plaintiff's damages, no more and no less. Damages are not allowed as a punishment and can not be imposed or increased to penalize the Defendants. You should not award compensatory damages for speculative injuries, but only for those injuries which the Plaintiff has actually suffered or that the Plaintiff is reasonably likely to suffer in the future.

If you decide to award compensatory damages, you should be guided by dispassionate common sense. Computing damages may be difficult, but you must not let that difficulty lead you to engage in arbitrary guesswork. On the other hand, the law does not require that the Plaintiff proves the amount of their losses with mathematical precision, but only with as much definiteness and accuracy as the circumstances permit.

You must use sound discretion in fixing an award of damages, drawing reasonable inferences where you find them appropriate from the facts and circumstances in evidence.

You should consider the following elements of damage, to the extent you find them proved by a preponderance of the evidence.



**QUESTION 6:**

What sum of money, if paid now in cash, would fairly and reasonably compensate Jose Rodriguez for his injuries, if any, resulting from the occurrence in question?

Consider the elements of damages listed below and none other. Consider each element separately. Do not include damages for one element in any other element. Do not include interest on any amount of damages you may find.

Answer separately, in dollars and cents, for damages, if any.

- a. Physical pain and mental anguish sustained by Jose Rodriguez in the past.

ANSWER: \_\_\_\_\_

- b. Physical pain and mental anguish that, in reasonable probability, Jose Rodriguez will sustain in the future.

ANSWER: \_\_\_\_\_

- c. Loss of earning capacity sustained by Jose Rodriguez in the past.

ANSWER: \_\_\_\_\_

- d. Loss of earning capacity that, in reasonable probability, Jose Rodriguez will sustain in the future.

ANSWER: \_\_\_\_\_

- e. Disfigurement sustained by Jose Rodriguez in the past.

ANSWER: \_\_\_\_\_

PJC 80.6A

**QUESTION 7:**

Was the physical injury to Jose Rodriguez a serious, permanent, and disabling injury?

ANSWER "Yes" or "No."

ANSWER: \_\_\_\_\_

**Go to Question 8.**

PJC 80.6A



**QUESTION 8:**

What sum of money, if any, should be assessed against Riddell, Inc. and awarded to Plaintiff as exemplary damages for the conduct found in response to Question No. 4?

“Exemplary damages” means an amount that you may in your discretion award as an example to others and as a penalty or by way of punishment, in addition to any amount that you may have found as actual damages.

Factors to consider in awarding exemplary damages, if any, are--

- a. The nature of the wrong.
- b. The character of the conduct involved.
- c. The degree of culpability of the wrongdoer.
- d. The situation and sensibilities of the parties concerned.
- e. The extent to which such conduct offends a public sense of justice and propriety.

Answer in dollars and cents, if any.

ANSWER: \_\_\_\_\_

### **Conclusion**

When you retire to the jury room to deliberate on your verdict, you may take this charge with you as well as exhibits which the court has admitted into evidence. Select your Foreperson and conduct your deliberations. If you recess during your deliberations, follow all of the instructions that the Court has given you about/on your conduct during the trial. After you have reached your unanimous verdict, your Foreperson is to fill in the Verdict Form from your answer to the questions. Do not reveal your answers until such time as you are discharged, unless otherwise directed by me. You must never disclose to anyone, not even to me, your numerical division on any question.

If you want to communicate with me at any time, please give a written message or question to the bailiff, who will bring it to me. I will then respond as promptly as possible either in writing or by having you brought into the courtroom so that I can address you orally. I will always first disclose to the attorneys your question and my response before I answer your question.

After you have reached a verdict, you are not required to talk with anyone about the case unless the Court orders otherwise.



DATED this \_\_\_\_\_ day of April, 2001.

EVANS, KEANE LLP

By \_\_\_\_\_  
Rex Blackburn  
State Bar No. 3170  
Paul J. Augustine  
State Bar No. 4608  
EVANS, KEANE LLP  
1101 W. River Street, Suite 200  
P. O. Box 959  
Boise, Idaho 83701-0959  
Telephone: (208) 384-1800  
Facsimile: (208) 345-3514

Mark D. Kamitomo  
State Bar No. 18803  
THE MARKAM GROUP, INC., P.S.  
421 West Riverside, Suite 1060  
Spokane, Washington 99201  
Telephone: (509) 747-0902  
Facsimile: (509) 747-1993

J. Arnold Aguilar  
State Bar No. 00936270  
Federal ID. No. 6822  
Artemis Square, Suite H-2  
1200 Central Boulevard  
Brownsville, Texas 78520  
Telephone: (956) 504-1100  
Facsimile: (956) 504-1408

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this \_\_\_\_\_ day of April, 2001, a true and correct copy of the foregoing document was served by first-class mail, postage prepaid, and addressed to; by fax transmission to; by overnight delivery to; or by personally delivering to or leaving with a person in charge of the office as indicated below:

Robert Summers

ROBERT B. SUMMERS & ASSOCIATES

P.O. Box 398

Llano, TX 78643

☐ U.S. Mail

☐ Facsimile (915) 248-0110

☐ Overnight Delivery

☐ Messenger Delivery

EVANS, KEANE LLP

By \_\_\_\_\_  
Rex Blackburn



**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
BROWNSVILLE DIVISION**

**RAQUEL O. RODRIGUEZ as legal  
guardian of JOSE L. RODRIGUEZ,**

**Plaintiff,**

**vs.**

**RIDDELL INC.; ALL AMERICAN  
SPORTS CORPORATION  
d/b/a RIDDELL/ALL AMERICAN,**

**Defendants.**

**Case No. B-CV-96-177**

**EXHIBIT P-3 TO PLAINTIFF'S  
PROPOSED PRETRIAL ORDER**

**PLAINTIFF'S PROPOSED VOIR DIRE QUESTIONS**

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1. Are you familiar with any of the following parties in this case, and if so, please explain:

Raquel O. Rodriguez

Jose L. Rodriguez

Riddell, Inc.

All American Sports Corporation dba Riddell/All American

2. Are you familiar with any of the following attorneys in this case, and if so, please explain:

J. Arnold Aguilar  
Rex Blackburn  
Paul J. Augustine  
Mark Kamitomo  
Robert Summers

3. Are you familiar with any of the following witnesses in this case, and if so, please explain:

**Lay Witnesses for the Plaintiff:**

Jesus Amaya  
Eddie Barrera  
Walker Raymond Cash, Jr.  
Danny Diaz  
Leonel Garza  
Diana Rodriguez Gomez  
Ralph Inusino  
Nelson Kraemer  
Fernanda Lopes  
Juan N. Rodriguez  
Raquel O. Rodriguez  
Maria Del Carmen Torres  
Eliseo Ruiz, Jr.  
Guile Gonzalez

**Expert Witnesses for the Plaintiff:**

Frederick Bass  
John W. Cassidy, M.D.  
Richard S. Goka, M.D.  
Richard A. Rubenstein, M.D.  
Richard L. Stalnaker, Ph.D.  
Gary K. Stimac, M.D.  
John D. White, M.D.  
Emma Y. Vasquez

**For the Defendant:**

Kenneth Clarke, Ph.D.  
Thomas A. Gennarelli, M.D.



A. R. Garza-Vale, M.D.  
Dave Halstead  
Dan Kult  
Nelson Kraemer  
James McElhaney, Ph.D.  
Ayub K. Ommaya, M.D.  
Walt Reed, Ph.D.

### **PRIOR JURY SERVICE**

4. Have you ever served on a jury before?
  - a. Was it a civil or criminal jury?
  - b. Did it involve a claim of personal injury?
  - c. Did you experience as a juror affect your beliefs or attitudes in a way that will affect your deliberations in this case?

### **EXPERIENCES WITH SPORTING EQUIPMENT**

5. Have you, or any of your family members, or close friends ever suffered an injury associated with the use of any sporting equipment?
  - a. Who suffered it?
  - b. What sporting equipment?
  - c. How did the injury occur?
  - d. Did the experience affect your beliefs or attitudes regarding the safety of the sporting equipment?
  - e. Did the experience affect your beliefs or attitudes about sporting equipment generally?

## **SPORTING GOODS MANUFACTURERS**

6. Do you hold any beliefs or attitudes about the safety or efficiency of sporting goods, especially football helmets?

- a. What beliefs or attitudes?
- b. What experience(s) have shaped those beliefs or attitudes?

## **PRODUCT SAFETY**

7. Do you hold any beliefs or attitudes regarding a manufacturer's responsibility to design safe products?

- a. What beliefs or attitudes?
- b. What experience(s) have shaped those beliefs or attitudes?

8. Do you hold any beliefs or attitudes about a manufacturer's responsibility to test products for safety before those products are made available to the public?

- a. What beliefs or attitudes?
- b. What experience(s) have shaped those beliefs or attitudes?

9. Do you hold any beliefs or attitudes about whether a manufacturer should use the best available materials when producing protective headgear, such as a football helmet?

10. Do you hold any beliefs or attitudes about whether a manufacturer of a product intended to protect its users from personal injury holds a special responsibility in designing and testing its products?

## **FOOTBALL**

11. Do you hold any belief or attitude about the sport of football that will affect your deliberation in this case?



- a. What beliefs or attitude?
- b. What experience(s) have shaped those beliefs?
- c. Any family members or close acquaintances play football? If so, who?
- d. Have any of those people been injured playing football? Please explain.

12. Do you believe that football helmets should be designed to protect players from most types of head injury?

13. Do you believe that football, because of its physical nature, is the type of sport in which injury cannot be prevented or protected, and will this belief or attitude affect your deliberations in this case?

- a. What beliefs or attitudes?
- b. What experience(s) have shaped those beliefs or attitudes?

## LAWSUITS

14. Do you hold any beliefs or attitudes about our legal system, generally, or lawsuits, in particular, that will affect your deliberations in this case?

- a. What beliefs or attitudes?
- b. What experience(s) have shaped those beliefs or attitudes?

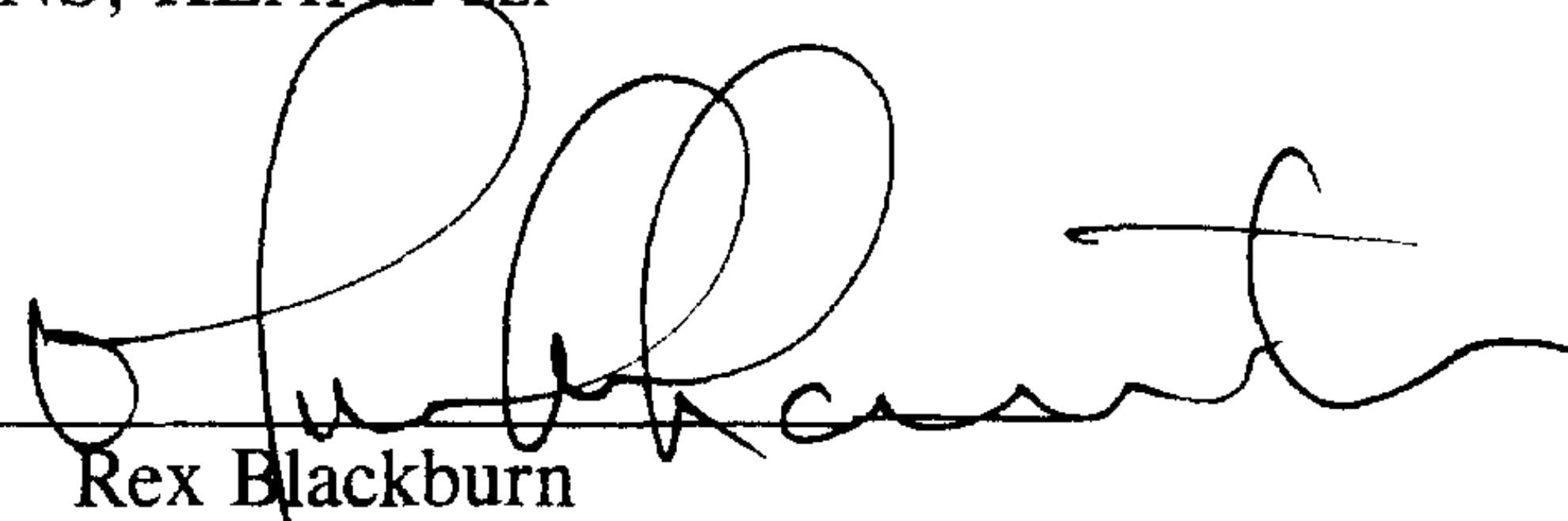
15. Do you hold any beliefs or attitudes about awarding money as compensation for personal injuries, that will affect your deliberations in this case?

- a. What beliefs or attitudes?
- b. What experience(s) have shaped those beliefs or attitudes?

DATED this 24 day of April, 2001.

EVANS, KEANE LLP

By



Rex Blackburn

State Bar No. 3170

Paul J. Augustine

State Bar No. 4608

EVANS, KEANE LLP

1101 W. River Street, Suite 200

P. O. Box 959

Boise, Idaho 83701-0959

Telephone: (208) 384-1800

Facsimile: (208) 345-3514

Mark D. Kamitomo

State Bar No. 18803

THE MARKAM GROUP, INC., P.S.

421 West Riverside, Suite 1060

Spokane, Washington 99201

Telephone: (509) 747-0902

Facsimile: (509) 747-1993

J. Arnold Aguilar

State Bar No. 00936270

Federal ID. No. 6822

Artemis Square, Suite H-2

1200 Central Boulevard

Brownsville, Texas 78520

Telephone: (956) 504-1100

Facsimile: (956) 504-1408

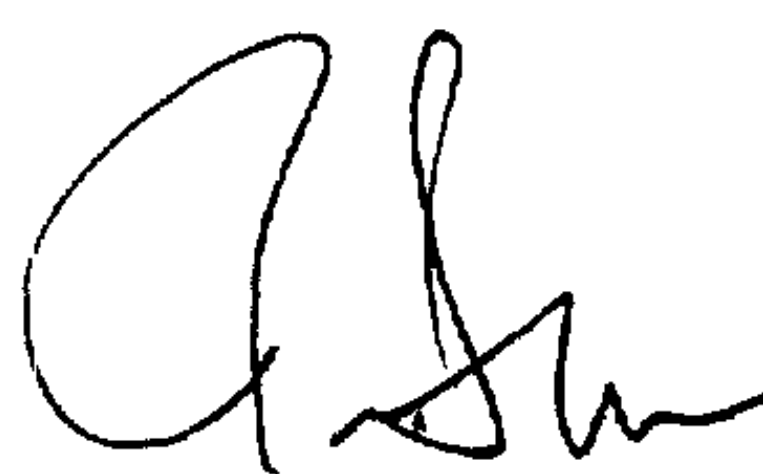


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I HEREBY CERTIFY that on this 24<sup>th</sup> day of April, 2001, a true and correct copy of the foregoing document was served by first-class mail, postage prepaid, and addressed to; by fax transmission to; by overnight delivery to; or by personally delivering to or leaving with a person in charge of the office as indicated below:

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Rex Blackburn

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
BROWNSVILLE DIVISION**

**RAQUEL O. RODRIGUEZ as legal  
guardian of JOSE L. RODRIGUEZ,**

**Plaintiff,**

**VS.**

**RIDDELL, INC., ALL AMERICAN  
SPORTS CORPORATION  
d/b/a RIDDELL/ALL AMERICAN,**

**Defendants.**

**Case No. B-CV-96-177**

**EXHIBIT P-5 TO PLAINTIFF'S  
PROPOSED PRETRIAL ORDER**

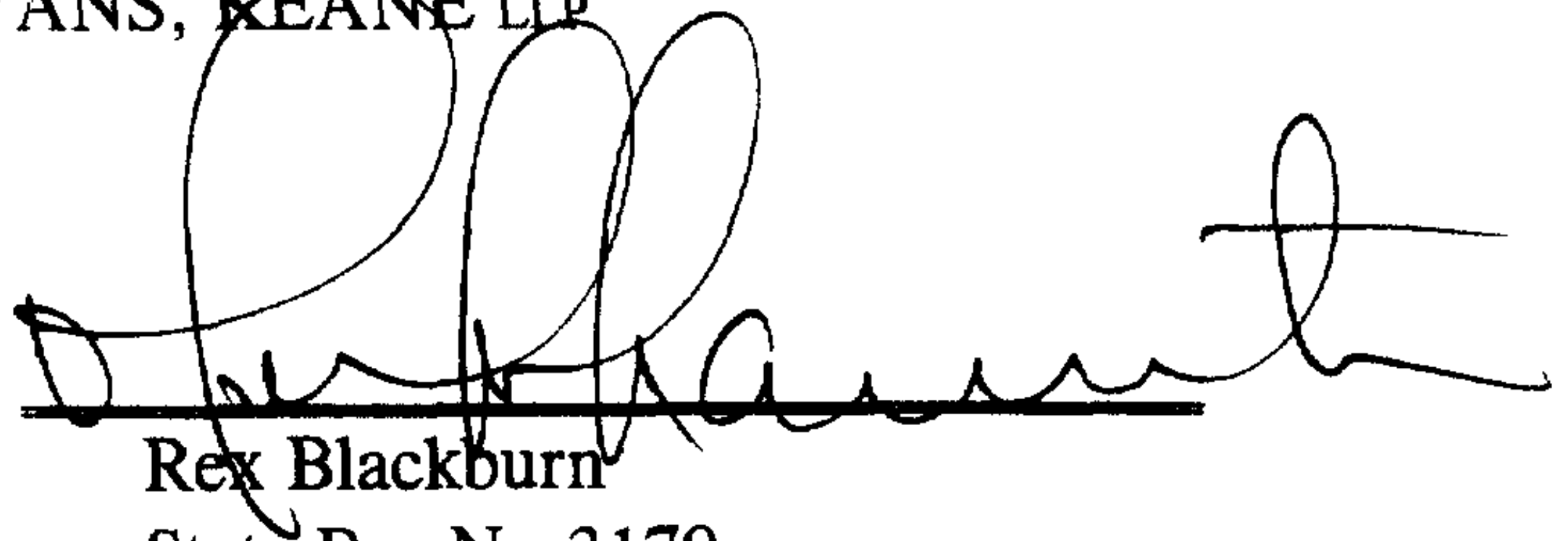
**PLAINTIFF'S EXPERT QUALIFICATIONS**



DATED this 24 day of April, 2001.

EVANS, KEANE LLP

By

A handwritten signature in black ink, appearing to read "Rex Blackburn", is written over a horizontal line. The signature is stylized with large loops and a long horizontal stroke at the end.

Rex Blackburn

State Bar No. 3170

Paul J. Augustine

State Bar No. 4608

EVANS, KEANE LLP

1101 W. River Street, Suite 200

P. O. Box 959

Boise, Idaho 83701-0959

Telephone: (208) 384-1800

Facsimile: (208) 345-3514

Mark D. Kamitomo

State Bar No. 18803

THE MARKAM GROUP, INC., P.S.

421 West Riverside, Suite 1060

Spokane, Washington 99201

Telephone: (509) 747-0902

Facsimile: (509) 747-1993

J. Arnold Aguilar

State Bar No. 00936270

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---

Rex Blackburn





Bass Consultants, Inc.

One Greenway Plaza  
Suite 600  
Houston, Texas 77046  
Fax (713) 871-8088  
Tel (713) 871-1118

## FREDERICK BASS, F.S.A.

Mr. Bass is President of Bass Consultants, Inc. a firm specializing in compensation, benefits and actuarial consulting throughout the southwestern United States. Mr. Bass' responsibilities include Employee Benefits (including actuarial consulting in Health & Welfare Benefits, and Pension Benefits), Communications, Executive Compensation, and Salary Administration Consulting.

Some of Mr. Bass' consulting engagements have included:

- Designing pension, profit sharing, and health & welfare programs for public and private employers.
- Establishing rate bases for self funded multiple employer welfare arrangements.
- Conducting actuarial valuations and administering a wide range of pension fringe benefit plans.
- Consulting with management and labor on group insurance and pension issues involved in labor negotiations.
- Consulting with plan sponsors regarding group insurance funding, pension funding, and alternative funding vehicles for both.
- Reviewing and analyzing financial results of pension, profit sharing, and health & welfare programs.
- Performing Diagnostic Reviews of total compensation programs (including Wage and salary, Executive Compensation, Employee Health / Welfare and Retirement Benefits, Executive Benefits and Perquisites).
- Designing and implementing Executive Compensation programs for senior management of client corporations.
- Designing wage salary programs to provide for internal equity among position classifications and external competitiveness.

Prior to his current position, Mr. Bass was with Peat Marwick Mitchell & Co. (currently KPMG Peat Marwick) where he was Principal-in-Charge of Human Resources Consulting Practice for the Southwest, regional actuarial principal for the southwestern United States, and a member of that firm's Actuarial Practice Committee.

Mr. Bass was also a Senior Vice President with a large midwestern financial organization and prior to that, Vice President and Actuary with a regional consulting firm.

Mr. Bass received a Bachelors degree in Mathematics in 1968 from Drew University. He is a Fellow of the Society of Actuaries, a Fellow of the Conference of Consulting Actuaries, a Member of the American Academy of Actuaries, and an Enrolled Actuary under the provisions of ERISA. He has spoken before the Society of Actuaries, the American Academy of Actuaries, the Risk & Insurance Management Society, Texas Society of CPA's and other organizations.



**ACADEMIC APPOINTMENTS**

1980-1984	Clinical Fellow in Psychiatry, Harvard Medical School
1984-1987	Instructor in Psychiatry, Harvard Medical School
1991-1997	Clinical Assistant Professor of Restorative Neurology and Human Neurobiology, Baylor College of Medicine
1996	Professor of Neurological and Neuropsychological Rehabilitation, Kurt Goldstein Institute of Neuropsychological Rehabilitation, Straubing, Germany

**HOSPITAL APPOINTMENTS**

1980-1984	Clinical Fellow, McLean Hospital, Belmont, Massachusetts
1983	Chief Resident, McLean Hospital, Belmont, Massachusetts
1984	Chief Resident, Psychopharmacology Services, McLean Hospital, Belmont, Massachusetts
1983-1984	Assistant Psychiatrist in Charge, Clinical Evaluation Unit, McLean Hospital, Belmont, Massachusetts
1984	Assistant Psychiatrist, McLean Hospital, Belmont, Massachusetts
1984-1987	Psychiatrist in Charge, Neuropsychiatry Unit, McLean Hospital, Belmont, Massachusetts
1987-1991	Medical Director, Neurobehavioral Programs, Laurelwood Hospital, The Woodlands, Texas
1988-1992	Consulting Physician, HCA Medical Center, Del Oro Hospital, Houston, Texas
1990	Consulting Physician, The Institute for Rehabilitation and Research, Houston, Texas
1990-1994	Consulting Physician, Houston Northwest Medical Center, Houston, Texas
1990	Courtesy Staff Physician, The Methodist Hospital, Houston, Texas
1991-1992	Medical Director, The Neurobehavioral Institute of Houston, The Woodlands, Texas
1992-1994	Medical Director, Neurobehavioral Programs, HCA Medical Center, Houston, Texas
1993	Consulting Physician, Total Lifecare Hospital, Houston, Texas
1994	Courtesy Staff Physician, Hermann Hospital, Houston, Texas
1994-1995	Medical Director, Neurobehavioral Program, Cypress Creek Hospital, Houston, Texas
1995	Active Staff Physician, Beacon Health Ltd. Specialty Hospital, The Woodlands, Texas
1995	Active Staff Physician, TIRR Lifebridge, Houston, Texas



1977-1979	American Medical Student Association
1979	<i>Alpha Omega Alpha</i>
1981	American Psychiatric Association
1981-1987	Massachusetts Psychiatric Society
1981-1987	Massachusetts Medical Society
1988-1992	Houston Neurological Society
1988	Houston Psychiatric Society
1991	Harris County Medical Society
1992	American Congress of Rehabilitation Medicine
1993	American Society of Neurorehabilitation
1995	American College of Forensic Examiners
1996	American Academy of Neurology

### **OTHER PROFESSIONAL APPOINTMENTS**

1982-1983	Admitting Physician, Human Resource Institute, Brookline, Massachusetts
1982-1984	Admitting Physician, Charles River Hospital, Wellesley, Massachusetts
1982-1985	Director, Psychopharmacology Services, The Greater Lawrence Mental Health Center, Lawrence, Massachusetts
1983-1984	Director, Psychogeriatric Program, The South Shore Mental Health Center, Quincy, Massachusetts
1983-1985	Admitting Physician, Hampstead Hospital, Hampstead, New Hampshire
1985-1987	Supervising Psychiatrist, Wild Acre Inns, Community Residence Program, Woburn, Massachusetts
1992	Executive Medical Director, Neurobehavioral Resources Ltd. Conroe, Texas
1996	Administrative Medical Director, Community Rehab Care, Inc. Newton, Massachusetts

### **TEACHING EXPERIENCE**

1976	Teaching Assistant, Molecular and Cellular Biology Department, Hiram College, Hiram, Ohio
1982	Medical student supervision, Outpatient Clinic, McLean Hospital, Belmont, Massachusetts
1982	Medical student teaching in psychopharmacology, McLean Hospital, Belmont, Massachusetts



1983-1984	Resident supervision, Emergency and Psychopharmacology Services, McLean Hospital, Belmont, Massachusetts
1984	Supervision, Affective Disease Program, McLean Hospital, Belmont, Massachusetts
1985-1987	Resident and medical student supervision, Neuropsychiatry Unit, McLean Hospital, Belmont, Massachusetts
1996	Kurt Goldstein Institute of Neuropsychological Rehabilitation, Summer graduate study program, Straubing, Germany

## **MAJOR PRESENTATIONS**

1984-1986	Medical Aspects of Affective Diseases, as Mead-Johnson Regional Fellowship speaker
1985-1987	Psychiatric Implications of Brain Electrical Activity Mapping, speaker for Nicolet Instruments
1986-1987	Psychopharmacologic Interventions for the Management of Behavioral Dyscontrol, for Connecticut Traumatic Brain Injury Association and Massachusetts Head Injury Foundation
1986	Depression in the Medically Ill Patient, Framingham Union Hospital and Greater Lawrence Mental Health Center
1986	Clinical Use of Brain Electrical Activity Mapping in Patients with Chronic Dysphoria, Grand Rounds, Maine Medical Center
1987	Psychopharmacologic Strategies for Management of Behavioral Dyscontrol, Fifth Annual Southwest Regional Head Injury Symposium, Cancun
1987	New Frontiers in Neuropsychiatry, Psychiatric Grand Rounds, Fair Oaks Hospital, Florida
1987	Psychopharmacologic Strategies for the Management of Behavioral Dyscontrol, New Medico Head Injury Systems/McLean Hospital Conference on Head Injury, Boston, Massachusetts
1987	New Psychopharmacologic Strategies for Managing Behavioral Dyscontrol, Eighth Annual Traumatic Head Injury Conference, Braintree Hospital, Massachusetts
1987	The Evaluation and Treatment of the Difficult Traumatic Head Injured Patient, Eighth Annual Traumatic Head Injury Conference, Braintree Hospital, Massachusetts
1987	What Families Need to Know About Medication for Head Injured Individuals, Massachusetts Head Injury Association
1988	What a Model Head Injury Program Should Look Like, Houston Chapter, Texas Head Injury Foundation



- 1988 Neuropsychological Aspects of LD/ADD, Learning Disabilities and Behavioral Problems Workshop, Conroe, Texas
- 1988 Brain Function and Impulse Control, International Center for Health and Education Symposium on Neurological Dysfunctions: Effects on Learning and Behavior, Kingwood, Texas
- 1988 Evaluation and Treatment of Patients with Previous Psychiatric Histories, Head Injury Conference sponsored by Tufts New England Medical Center and Greenery Rehabilitation Group, Boston, MA
- 1988 Evaluation and Treatment of Patients with Previous Psychiatric Histories, Ninth Annual Traumatic Head Injury Conference, Braintree, MA
- 1988 Depression in the Traumatically Brain Injured Patient, Ninth Annual Traumatic Head Injury Conference, Braintree, MA
- 1988 Assessment Issues in Traumatic Brain Injury Rehabilitation, National Head Injury Foundation Annual Symposium, Atlanta, GA
- 1989 Pharmacologic Treatment of Behavior Disorders Following Traumatic Brain Injury, Fourth Annual Symposium on Advances in Head Injury Rehabilitation, Dallas, TX
- 1989 Medical Management of Behavior Disorders, Seminar in cooperation with National Head Injury Foundation, Arlington, VA
- 1989 Evaluation and Treatment of Patients with Previous Psychiatric Histories,<sup>1</sup> Second Annual Head Injury Conference sponsored by Tufts New England Medical Center and Greenery Rehabilitation Group, Boston, MA
- 1989 Suicide: Prevention and Assessment of Risk, Second Annual Head Injury Conference sponsored by Tufts New England Medical Center and Greenery Rehabilitation Group, Boston, MA
- 1989 The Medical Management of Behavior, First Annual Del Oro Institute for Rehabilitation Conference, Houston, TX
- 1989 Neurobehavioral Pharmacology, Eighth Annual Texas Head Injury Foundation Conference, Austin, TX
- 1989 Neuropharmacology, Lecture at Hilltop Rehabilitation Hospital, Grand Junction, CO
- 1989 Biology of Emotion, Tenth Annual Traumatic Head Injury Conference, Braintree, MA
- 1989 The Kind of Head, Tenth Annual Traumatic Head Injury Conference, Braintree, MA
- 1989 Psychopharmacology, New York University Symposium on Head Trauma, New York City, NY



- 1989 The Use of Anticonvulsants in the Treatment of Traumatic Brain Injury, Eighth Annual National Head Injury Foundation Conference, Chicago, IL
- 1990 Post Acute Psychiatric Management of Traumatic Brain Injury, Thirteenth Annual Head Trauma Rehabilitation Conference, San Jose, CA
- 1990 Friends or Fiends: Drugs in TBI, Thirteenth Annual Head Injury Rehabilitation Conference, San Jose, CA
- 1990 Neuropharmacologic Management of Traumatic Brain Injury Patients, Southern Society of Physical Medicine and Rehabilitation, New Orleans, LA
- 1990 Home Before Dark: A Guide to Neurobehavioral Treatment Planning, Eleventh Annual Traumatic Head Injury Conference, Braintree, MA
- 1990 The Man Who Mistook Himself for a Saint, Eleventh Annual Traumatic Head Injury Conference, Braintree, MA
- 1990 A Comprehensive Approach to Epilepsy, Epilepsy Foundation of Colorado, Denver, CO
- 1990 Pharmacologic Treatment of Head Trauma, Nebraska Head Injury Association Conference, Lincoln, NE
- 1990 Sleep Disorders, Ninth Annual National Head Injury Association Symposium, New Orleans, LA
- 1991 Update on Neuropharmacology in Brain Injury Rehabilitation, Ninth Annual Southwest Head Injury Symposium, Vail, CO
- 1991 Post Acute Psychopharmacological Management of Neurobehavioral Disorders, International Brain Injury Symposium, New Orleans, LA
- 1991 Advances in Medical Management of Traumatic Brain Injury: Psychopharmacology, New Orleans, LA
- 1991 Neurobehavioral Consequences and Management of Closed Head Injuries, Houston Association for Communication Disorders, Houston, TX
- 1991 Psychopharmacology and Management of Depression, Third Annual Conference on Rebuilding Shattered Lives, JFK Johnson Rehabilitation Institute, Edison, NJ
- 1991 Suicide: Prevention and Assessment of Risk, Third Annual Conference on Rebuilding Shattered Lives, JFK Johnson Rehabilitation Institute, Edison, NJ
- 1991 Management of Agitation in TBI Patients, Houston Rehabilitation Institute, Houston, TX
- 1991 Neurophysiologic Substrates of Behavior, Neurobehavioral Institute of Houston, Houston, Texas



- 1991 The Man Who Mistook Himself for a Saint: Some Thoughts on the Remediation of Anosognosia, Annual Texas Head Injury Association Conference, Austin, TX
- 1991 Progress in the Pharmacologic Management of Behavior Problems in Post Acute TBI, New England Society of Physical Medicine and Rehabilitation, York Harbor, ME
- 1991 Functional Implications of Minor Brain Injury, American International Health & Rehabilitation Services, Inc., Houston, TX
- 1991 Mild to Moderate Head Injury: What Is It?, Houston Claims Managers Council, Houston, TX
- 1991 Mild to Moderate Brain Injury: What Is It?, Utah Head Injury Association and Utah State Bar, Salt Lake City, UT
- 1992 Home Before Dark: A Guide to Neurobehavioral Treatment Planning, Georgia State Board of Worker's Compensation, Atlanta, GA
- 1992 Understanding the Ramifications of Closed Head Injuries, Texas Texas College of Probate Judges 1991 Annual Meeting, Corpus Christi, TX
- 1992 What is Neurobehavioral Treatment? Southwest Insurance Association, March Meeting, Houston, TX
- 1992 Understanding Minor Brain Injury. EBI Companies, Inservice for Adjusters, Houston, TX
- 1992 Minor Brain Injury, Neurobehavioral Institute of Houston, Annual seminar for case managers and rehabilitation nurse specialists, Houston, TX
- 1992 Suicide: Prevention and Assessment of Risks, Broward Association of Rehabilitation Nurses, Ft. Lauderdale, FL
- 1992 The Blind Men and The Elephant, Eleventh Annual Texas Head Injury Association Conference, Austin, TX
- 1992 Home Before Dark; A Guide to Neurobehavioral Treatment Planning, Annual State Board of Workers' Compensation Seminar, Atlanta, GA
- 1992 What is Neurobehavioral Treatment? Firemen's Fund Insurance Seminar, Atlanta, GA
- 1992 Diagnosing, Treating, and Litigating the Mild/Moderate Head Injury Case, Eighth Annual Alabama Head Injury Foundation State Conference, Mobile, AL
- 1992 Traumatic Brain Injury and Advances in Pharmacology, HOPE Network, Southfield, MI
- 1992 Understanding Minor Brain Injury, RINC Rehabilitation Nurses, Grand Rapids, MI



- 1992 For Now We See Through a Glass Darkly: TBI and Psychiatric Co-morbidity, Braintree Hospital 13th Annual Traumatic Head Injury Conference, Boston, MA
- 1992 Mom, Apple Pie, and the Team: Rehabilitation Team Dynamics, Braintree Hospital 13th Annual Traumatic Head Injury Conference, Boston, MA
- 1992 Understanding the Ramifications of Closed Head Injuries, Texas College of Probate Judges, Dallas, TX
- 1992 Diagnosing, Treating, and Litigating the Minor/Moderate Head Injury Case, American Association of Legal Nurse Consultants, Greater Houston, Texas Chapter, Houston, TX
- 1993 The Managed Rehabilitation Process, Sheldon Berrol, M.D. 11th Annual Southwest Brain Injury Symposium, Santa Barbara, CA
- 1993 Understanding the Ramifications of Closed Head Injuries, National College of Probate Judges Conference, Maui, HI
- 1993 Advances in the Treatment of Traumatic Brain Injury, Del Oro Institute for Rehabilitation Spring Seminar, Houston, TX
- 1993 Suicide: Prevention and Assessment of Risks, Florida State Association of Rehabilitation Nurses, Orlando, FL
- 1993 Awareness - The Ultimate Rehabilitation Challenge, Fourteenth Annual Braintree Hospital Traumatic Brain Injury Conference, Boston, MA
- 1993 Psychopharmacology and Mild Brain Injury, Fourteenth Annual Braintree Hospital Traumatic Brain Injury Conference, Boston, MA
- 1993 Home Before Dark: A Guide to Neurobehavioral Treatment Planning for the Traumatically Brain Injured, The Houston/Gulf Coast Chapter Case Management Society of America Conference, Houston, Texas
- 1993 Self-Awareness of Deficits in the Traumatically Brain Injured: Vocational Implications and Remediation, Texas Association of Rehabilitation Professionals in the Private Sector, Houston, TX
- 1994 Brain to Mind to Self, St Luke's Hospital Ninth Annual Professional Practices Symposium, Houston, Texas.
- 1994 No One Wants Me, Where Do I Go? Insurance Rehabilitation Study Group, Philadelphia, PA
- 1994 Awareness: Impact on Recovery and Treatment, Marianjoy Rehabilitation Hospital and Clinics, Lisle, Illinois
- 1994 Modern Methods of Pharmacological Management of Post Traumatic Behavioral Disorders, Including Depression, American Academy of Neurology Annual Meeting, Washington, DC.



Dolan MJ, Cassidy, J: "Neurobehavior - A New Frontier in Contemporary Psychiatry," Laureate, published by Laurelwood Hospital, 1988.

Cassidy, J: Fluoxetine, a new serotonergically-active antidepressant. *J Head Trauma Rehabil*, 4(2):67-9, 1989.

Baldessarini, R, Stein, MD, Cassidy, JW, Teicher, MH: Anticonvulsant co-treatment may increase toxic metabolites of antidepressants and other psychotropic drugs. *J Clin Psychopharm*, 8:381-2, 1988.

Cassidy, J: "Role Psychotropic Medications Play in Treatment of Behavioral Problems in the Traumatically Brain Injured." ACRM Head Injury Task Force Newsletter, Clinical Note, 1988.

Cassidy, J: Neurochemical substrates of aggression: toward a model for improved intervention in the brain injured. Part 1. *J Head Trauma Rehabil*, 5(2):83-6, 1990.

Cassidy, J: Psychopharmacologic treatment of posttraumatic behavioral disorders, in Wood RL (ed): *Neurobehavioral Sequelae of Traumatic Brain Injury*, New York, Taylor & Francis Ltd, 1990, pp 219-47.

Cassidy, J: Neurochemical substrates of aggression: toward a model for improved intervention in the brain injured. Part 2. *J Head Trauma Rehabil*, 5(3):70-73, 1990.

Cassidy, J: Insomnia. *J Head Trauma Rehabil*, 6(4):81-83, 1991.

Bonnet, KA, Clothier, J, Freeman, T, and Cassidy, J: SPECT, computer-analyzed EEG and symptom correlations in neuropsychiatric patients, First International Congress on Brain Electromagnetic Topography, Abstract, Osaka, Japan, 1992.

Cassidy, J: *Brainstorms: Recovery from Brain Injury*, Bantam Books, 1992.

Cassidy, J: Neurobehavioral Rehabilitation: Emerging paradigm or passing fancy. "Moving Ahead", ACRM Newsletter, October, 1992.

Cassidy, J: Neuropathology of Traumatic Brain Injury, in Silver JS, Yudofsky SC, Hales RE (eds): *Psychiatric Aspects of Traumatic Brain Injury*, Washington, DC, American Psychiatric Press, 1994, pp 43-79.

Cassidy, J: Neuropharmacologic management of destructive behavior following traumatic brain injury. *J Head Trauma Rehabil*, 9(3):43-60, 1994.

Cassidy, J: Minor brain injury and malingering. *The Case Manager*, Mosby-Year Book, Inc., 7(4):65-70, 1996.

Mills, VM, Cassidy JW, Katz DI (eds): *Neurologic Rehabilitation: A guide to diagnosis, prognosis and treatment planning*. Cambridge, MA, Blackwell, 1997.

Cassidy, J: Problem patients: outliers in rehabilitation, in Mills, VM, Cassidy JW and Katz D (eds): *Neurologic Rehabilitation: A guide to diagnosis, prognosis and treatment planning*. Cambridge, MA, Blackwell, pg 307-338, 1997.



**RICHARD S. GOKA, M.D.****(209) 261-3090*****Physical Medicine and Rehabilitation*****Fax (209) 261-3085**

**CURRICULUM VITAE  
RICHARD S. GOKA, M.D.**

**EDUCATION:**

University High School, Los Angeles, California	Grad. 1965
Santa Monica College, Santa Monica California	1965-1967
Woodbury College, Los Angeles, California	1968-1970
California State University, Hayward, California Graduated, B.S. Biology	1971-1973
Universidad Autonoma de Guadalajara School of Medicine Guadalajara, Jalisco, Mexico Graduated, Physician and Surgeon	1973-1977
College of Medicine and Dentistry, New Jersey Rutgers Medical School Fifth Pathway Program at St. Joseph's Hospital Paterson, New Jersey	1977-1978

**Post Graduate Education**

University of Utah, College of Medicine Internship (Category *)	1978-1979
University of Utah, College of Medicine Residency, Physical Medicine and Rehabilitation	1978-1981

**Licenses**

New York (136164) - Inactive	Oct., 1978
Utah (06326-1022-0)	Dec., 1979
California (A-36256)	Dec., 1980
DEA (AG9079078)	1979

**CURRICULUM VITAE**  
**RICHARD S. GOKA, M.D.**  
**Page 2**

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**Specialty Certification**

American Board of Physical Medicine and Rehabilitation, Diplomat, Certificate Number 1866	May 1982
American Board of Pain Management Diplomat, Certificate Number 1778	Oct. 1990
American Board of Forensic Examiners, Diplomat, Certificate Number 1662	Feb. 1996
American Board of Disability Analysts Diplomat & Sr.. Disability Analysis, Cert. No 2948-96	Sept. 1996
Case Manager, Certified Number M-04731	May, 1993

**Academic Appointments**

University of Utah, College of Medicine Clinical Instructor in Physical Medicine and Rehabilitation	1981-1988
Universidad Autonoma de Guadalajara, Visiting Professor	1985
Emory University, Visiting Faculty	1985
Emory University, Visiting Faculty,	1986

**Committees and Appointments**

American Academy of Physical Medicine and Rehabilitation: Brain Injury, Special Interest Group, Member	1986-1988
Section of Brain Injury Rehabilitation, Member	1988-
Task Force, Subacute Rehabilitation, Chair	1993
American Congress of Rehabilitation Medicine: Membership Committee, Member	1989-1992
Public Relations and Marketing Committee, Task Force	1990
Interdisciplinary Special Interest Group on Brain Injury, Member	1986-
Membership Committee, Chairman	1987-1993
Minor Brain Injury, Ethics and Management of Persistent Veg. State, Member	1987-1992
Post-Acute Committee, Member	1989-1993
Inpatients, Member	1991-1993
Professional Education	1989-1995
Case Management/Reimbursement Committee	1988-1995
American Subacute Care Association: President, Board of Directors	1993-1994
Board of Directors	1993-1995
CAPP Care, Irvine, California Consultant	1994-



**CURRICULUM VITAE**  
**RICHARD S. GOKA, M.D.**  
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Case Management Society of America:	
Government Affairs Committee, Member	1992-1993
Northern California Governmental Affairs, Member	1992
Community Hospitals of Central California, Fresno, CA:	
Geriatric Task Force, Member	1990-1991
Fresno Community Hospital, Cancer Committee, Member.	1990-1992
Home Health Agency, Board Member	1990-1993
Leon S. Peters Rehabilitation Center:	
Medical Director	1989-1992
Consultant	1992-1993
Medical Director, Outpatient	1993-1994
Holy Cross Hospital, Salt Lake City, UT:	
Medical Rehabilitation Committee; Member, Chairman	1982-1984
Patient Care Committee, Member	1983-1987
Utilization Review Committee, Member	1983-1986
Medical Rehabilitation Advisory Committee, Member	1984-1989
Professional Office Building Committee, Member	1987-1989
Holy Cross Hospital, Physical Medicine and Rehabilitation,	
Acting Medical Director	1982-1983
Medical Director	1983-1987
S.J. & Jesse E. Quinney Rehabilitation Institute of Holy Cross	
Hospital, Salt Lake City, Utah	
Medical Director	1987-1989
Learning Services, Gilroy, California	
Medical Consultant	1990-1994
Advisory Committee	1996-1997
Medical Review Institute, Salt Lake City, Utah	
Consultant	1992-
Meridian Neurocare, Fresno, California	
Consultant	1991-
Acting Medical Director	1994
Mutual of Omaha, Omaha, Nebraska	
Consultant	1994-
National Subacute Care Association	
Board of Directors, Member	1995-1996
Pacific Review Services, Cypress, California	
Medical Consultant	1991-1994
Personal Health Care, Irvine, California	
Consultant	1994-

**CURRICULUM VITAE**  
**RICHARD S. GOKA, M.D.**  
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Rivendell Children and Youth Center, Consultant	1987-1988
Sandy Regional Rehabilitation and Convalescent Center, Consultant	1987-1989
Sante Health System, Fresno, California Assistant Medical Director	1994-1995
University of Utah, College of Medicine: Pain Clinic, Division of Behavioral Medicine, Consultant	1981-1982
Villa Serena, Magna, Utah, Medical Director	1987-1989
Western States Administrators/Q.C. Medical, Fresno, California Medical Director	1990-1995

**Hospital Staff Appointments**

Holy Cross Hospital, Salt Lake City, UT Associate Staff	1981-1982
Active Staff	1982-1989
University of Utah, Medical Center, Salt Lake City, Utah Courtesy Staff	1981-1988
Fresno Community Hospital, Fresno, California Provisional	1989-1990
Active Staff	1990-1992
Active Unified CHCC Staff	1992-
Clovis Hospital, Clovis, California Provisional Staff	1989-1990
Courtesy	1990-1992
Unified CHCC Staff	1992-
Sierra Hospital, Fresno, California Provisional Staff	1989-1992
Unified CHCC Staff	1992-1996
Valley Medical Center, Fresno, California Provisional Staff	1990-1992
St. Agnes Medical Center, Fresno, California Provisional Staff	1990-1992
Courtesy Staff	1992-



**CURRICULUM VITAE**  
**RICHARD S. GOKA, M.D.**  
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San Joaquin Rehabilitation Hospital	
Provisional Staff	1991-1992
Courtesy Staff	1992-

**Professional Associations**

American Academy of Physical Medicine and Rehabilitation, Fellow	1981-
American Association of Electrodiagnosis and Electromyography, Member	1982-
American Congress of Rehabilitation Medicine Member	1981-
American Medical Association Member	1980-
American Paraplegia Society Member	1991-
American Society of Clinical Hypnosis and Related Research, Member	1981-1988
American Spinal Injury Association Member	1984-
American Subacute Care Association Member	1993-1995
California Medical Association Member	1989-
Case Management Society of America Member	1991-
Northern California, Member	1992-
Central California, Member	1995-
Fresno-Madera County Medical Society, Member	1990-
International Medical Society of Paraplegia Member	1981-

**CURRICULUM VITAE**  
**RICHARD S. GOKA, M.D.**  
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International Rehabilitation Medicine Association Member	1982-
International Society of Hypnosis Member	1982-1988
National Subacute Care Association Member	1995-
Salt Lake County Medical Society Member	1980-1989
Utah State Medical Society Member	1980-1989

Other Appointments and Committees.

City View Boarding Home, Salt Lake City, Ut Member, Board of Directors	1982-1987
Contemporary Long Term Care, Bills Communication Riverton, New Jersey Advisor	1995-1996
Commission on Accreditation of Rehabilitation Facilities, Surveyor	1984-1992
Fresno City College, Disabled Students Programs and Services, Community Advisory Committee, Member	1996-
Snowbird Handicap Ski Foundation Member	1981-1983
State Of Utah, Department of Education: Rehabilitation Services, Consultant Services Advisory Council, Member	1981-1989 1982-1983
State of Utah, Governor's Committee for Employment of the Handicapped, Member	1981-1986
State of Utah, Division of Registration, Department of Business Regulation, Acupuncture Licensing Board, Member	1983-1989
Subacute Care, Bills Communication Riverton, New Jersey Advisor	1995-1996



**CURRICULUM VITAE**  
**RICHARD S. GOKA, M.D.**  
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**Consultant**

Western Neuro Care, Tustin, California	1987
Synergos Neurological Retraining Center, Pleasanton, California	1989
Western State Administrators, Fresno, California	1990
Fortis Corporation, Sacramento, California	1990

**Projects**

Motion Pictures (with Robert Watanabe, M.D.)  
 Metatarsal Osteotomy of the Cavus Foot  
 Ligamentous Injuries of the Ankle  
 Rupture of the Achilles Tendon  
 Hauser Patellar Tendon Transplant

**Video Tapes**

Bear I - Adult Volume Ventilator  
 (University of Utah, 1981)

**Television and Radio Interviews:**

"Prime Time Access", KSL, Salt Lake City, Guillain Barre Syndrome,	1985.
"Cover Story", KTVX NEWS, Salt Lake City, Traumatic Brain Injury,	1989.
"Valley Morning" KFSN, Fresno, California, Interview on Rehabilitation,	1989.
"Daly's Events", KJAY, Sacramento, California, Traumatic Brain Injury,	1990.
"Independence Ringing", Continental Cable Vision Channel 4, Brain Injury Support Network of Central California, Fresno, California	1991.
"Professional Review", KFRE Radio Fresno, California	1994.

**Publications And Major Presentations**

Baer, R.D., Goka, R.S., Smith, G., "Electrodiagnosis in Entrapment of the Intermediate Dorsal Cutaneous Branch of the Superficial Peroneal Nerve," Orthopedic Review, Vol. XI:3, pgs 105-107, Mar. 1981

Escobar, P.L., Goka, R.S., "Carpal Tunnel Syndrome: Palmar Sensory Latencies to the Middle Finger and Wrist," Ortho. Review, Vol. 14:10, pgs. 633-639, Oct. 1985.

Goka, R.S., Simpson, V., "Conservative Treatment of Knee Flexion Contractures: A Case Study," Presented to the American Academy of Physical Medicine and Rehabilitation Annual Meeting, Boston, Ma., Oct. 1984.



**CURRICULUM VITAE**  
**RICHARD S. GOKA, M.D.**  
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Goka, R. S., Toppel, A.H., Giles, D., "Commission on Accreditation of Rehabilitation Facilities (CARF)," A Primer On Management For Rehabilitation Medicine, ed., Maloney, F.P., Physical Medicine and Rehabilitation, State of the Art Reviews, Vol. 1:2, pg. 317, May 1987.

Macnamara, S.E., Gummow, L.J., Goka, R.S., Gregg, C.H., "Caring for Stroke Patients: The Relationship of Stress and Time," Presented at the American Academy of Physical Medicine and Rehabilitation, Annual Meeting, Baltimore, Md., Oct., 1986. Published: Rehabilitation Psychology, Vol. 35:2, 1990.

Goka, R.S., "Minor Brain Injury: Disability Determination," Presented at the American Congress of Rehabilitation Medicine, Annual Meeting, Seattle, Washington, Nov. 1988.

Goka, R.S., "Physician Case Manager," Presented at the National Head Injury Foundation, Annual Meeting, Atlanta, Georgia, Nov. 1988

Raftis, J.T., Goka, R.S., "Rehabilitation-The Responsibilities," Journal of Insurance Medicine, Vol. 20:3, pg. 4, 1988.

Goka, R.S., "Rehabilitation: Education is Treatment," Correspondence, Journal of Insurance Medicine, Vol. 20:4, pg. 77, 1988

Artman, J.W., Goka, R.S., "Head Control: Feedback Device for Brain Injured Patients," Presented at the 7th Annual Southwest Head Injury Symposium, Park City Utah, Jan. 1989.

Goka, R.S., Adams, H.R., Parson, K., "Physicians Role in Medical Case Management," Panel Discussion, Association of Medical Case Managers, Monthly Meeting, Los Angeles, California, 1989.

Goka, R.S., "Practice Guidelines Not Best Approach," Correspondence, Am. Med. News, Sept. 28, 1990.

Goka, R.S., "Post Concussion Syndrome," Issues and Viewpoints, Gayle Foster and Associates, Fall 1990.

Feldman, B., Carr, V., Goka, R., Haussler, P., "Case Management-vs-Rehabilitation," Panel Discussion, Casa Colina Case Management Conference, Palm Springs, CA., March 1991.

Goka, R. S., Arakaki, A.H., "Centers of Excellence, Choosing The Appropriate Rehabilitation Center," Journal Of Insurance Medicine, Vol. 23:1, pg. 66, 1991.

Goka, R.S., "Case Management, A Rehabilitation Physicians Prospectus," Journal of Insurance Medicine, Vol. 23:4, Winter 1991.

Goka, R.S., "Americans with Disability Act: Physicians Responsibility," Workshop faculty, Fresno, CA, Sept. 1992



**CURRICULUM VITAE**  
**RICHARD S. GOKA, M.D.**  
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Goka, R.S., "Traumatic Brain Injury," American Congress of Rehabilitation Medicine, Brain Injury Workshop, Panel Faculty, Denver, CO, Oct. 1992

Goka, R.S., "Documentation to Obtain Reimbursement," Faculty, Focus Session, American Congress of Rehabilitation Medicine, Annual Meeting, San Francisco, CA., Nov. 1992

Goka, R.S., "Comprehensive Rehabilitation: A Universal funding Strategy and System of Documentation," Faculty, Course, American Congress of Rehabilitation Medicine, Annual Meeting, San Francisco, CA., Nov. 1992.

Goka, R.S., "Preserving and Restoring Muscle Strength," U.C.S.F., Walter A. Rohlfing, M.D. Lectureship, 6th Annual Meeting, Fresno, CA, Mar. 1993

Goka, R.S. & Arakaki, A.H., "Americans with Disability Act," Western Claims Conference, Burbank, CA, Mar. 1993

Goka, R.S., "The Difference between Subacute Care and Acute Rehabilitation," Memorial Hospital, Visalia, CA, Apr. 1993.

Goka, R.S., "Continuum of Care, Traumatic Brain Injury," Fresno Community Hospital, Fresno, CA, Jun. 1993.

Geller, C., Barker, D., Eskstrand, R., Goka, R., Pomper, C., & Till, M.; "Roles, Goals, Access and Process: Case Management Interface on the Legislative Continuum," Northern California CMSA Chapter Second Annual Conference, Concord, CA, Aug. 1992

Goka, R.S., "Acute Rehabilitation verse Subacute Rehabilitation," Second Annual: Current Concepts in Subacute Patient Care, Creighton University School of Medicine, Omaha, NE, Sept. 1993.

Kay, T., Harrington, D., Adams, R., Anderson, T., Berrol, S., Cicerone, K., Dahlberg, K., Gerber, D., Goka, R., Harley, P., Hilt, J., Horn, L., Lehmkuhl, d., Malec, J.; "Definition of Mild Traumatic Brain Injury," Journal of Head Trauma Rehabilitation, Vol. 8:3, Pages 86-87, 1993.

Goka, R.S., "Subacute Care," Medical Case Management Conference V, Annual Meeting, Individual Case Management Association, Orlando, FL, Sept. 1993.

Goka, R.S., "Subacute Care," Annual meeting, Washington Medical Case Managers, Seattle, WA, April 1994.

Goka, R.S., "Subacute Rehabilitation v. Comprehensive Inpatient Rehabilitation," Casa Colina, 9th Annual Case Management of Catastrophic Injury Conference, Palm Springs, CA, April 1994.

Goka, R.S., "The Current Issues of Subacute Care," Insurance Rehabilitation Study Group, Spring Meeting, Philadelphia, PA, April 1994.



**CURRICULUM VITAE**  
**RICHARD S. GOKA, M.D.**  
**Page 10**

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Goka, R.S., "Subacute Care: Physician and Staffing," Subacute Rehabilitation Conference, Barrow Neurological Institute, Phoenix, AZ, May 1994.

Goka, R.S., "Subacute & SNF Rehab, The Future?" Annual Scientific Meeting, California Society of Physical Medicine & Rehab., Lake Tahoe, CA, May 1994.

Goka, R.S., "Subacute Care in Managed Care Environment," Invitational Forum for Liaison network Organizations, Joint Commission on Accreditation of Healthcare Organizations, Chicago, IL, June 1994.

Goka, R.S., "Subacute Care," Key note speaker, Pennsylvania Hospital Association, Hershey, PA, Aug. 1994.

Goka, R.S., "Subacute Rehabilitation: Academy Position," Annual Meeting, American Academy of Phy. Med. & Rehab., Anaheim, CA, Oct. 1994.

Goka, R.S., "How Case Manager Can Determine the Appropriate Subacute Center," Medical Case Management Conference VI, San Diego, CA Oct. 1994.

Goka, R.S., "Subacute Rehabilitation: The Future," Presented at Annual Meeting, American Osteopathic Association, San Francisco, CA, Nov. 1994.

Goka, R.S., Arakaki, A.H., "Continuum of Care, Traumatic Brain Injury," Journal of Insurance Med., Vol. 26:4, Fall 1994.

Hyatt, L.Z., Goka, R.S., et.al, Subacute Care: Redefining Healthcare, PROBUS Pub.,sub. of Times Mirror, Corp., Chicago, IL, Spring 1995.

Goka, R.S., "Trends in Subacute Care," Iowa Head Injury Association, Presented at Annual Meeting, Des Moines, Iowa, Mar. 1995.

Goka, R.S., Keynote Speaker, "Changing Trends in Stroke Rehabilitation: Does it Work," Rehabilitation Institute of Chicago, Presented at Annual Meeting, Chicago, IL, April 1995.

Goka, R.S., "Subacute Rehabilitation," Presented at Annual meeting of the California Medical Directors Association, Anaheim, CA, May 1995.

Goka, R.S., "Documentation Issues In Subacute Rehabilitation for Managed Care," American Academy of Physical Medicine & Rehabilitation, Presented at Annual Meeting, Orlando, FL, Nov. 1995

Jay, G W., Goka, R.S. & Arakaki, A., "Mild Traumatic Brain Injury: Review of Clinical Data, Appropriate Evaluation and Treatment," Journal of Insurance Med., Vol. 27:4, Spring 1996, pgs 262-282.

Goka, R.S., "Life Care Planning & Other Rehabilitation Issues in Litigation," Presented at Annual meeting of Bay Area Chapter of Northern California, American Association of Legal Nurse Consultants, Walnut Creek, CA, Oct. 1996.



**CURRICULUM VITAE**  
**RICHARD S. GOKA, M.D.**  
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Goka, R.S., "Subacute Care in the Rehabilitation Setting," Presented at Subacute Care Conference: Current Issues - Future Trends, U.C.S.F and California Geriatric Education Center-San Joaquin Valley Program at CSU Fresno, Fresno, CA, Feb. 1997.

Goka, R.S., "Fibromyalgia and Myofascial Pain Syndromes," Presented at Central California, Case Management Society of American meeting, Fresno, CA, Jun. 1997.

Goka, R. S., "Mild Brain Injury and Subacute Care," Presented at Rehabilitation Insurance Nursing Group meeting, Dublin, CA, Oct. 1997.

Goka, R.S., "Subacute Care & Legal Issues in California," Presented at AAPMR annual Meeting, Atlanta, GA, Nov. 1997.

Goka, R.S., "Primary Care Approach to Neuropathic/Musculoskeletal Pain," UCSF-Fresno, 8th Annual Family Medicine Update, Fresno, CA. Jan. 1998.



**RICHARD A. RUBENSTEIN, M.D.**

The Medical Center  
2970 Hilltop Mall Road, Suite 203  
Richmond, California 94806-1947

(510) 222-4479  
(800) 426-9558

FAX (510) 222-4092

**EDUCATION AND TRAINING:**

B.A. (Honors major in Biology), Amherst College, Amherst, Massachusetts, 1962-66. Doctor of Medicine, Boston University School of Medicine, 1966-70. Straight Medical Internship, St. Elizabeth's Hospital of Boston, Tufts University Medical Service, 1970-71. Junior Assistant Resident in Neurology, Boston University School of Medicine and Affiliated Hospitals' Neurology Residency Program, 1971-72. Senior Assistant Resident in Neurology, Boston Veterans Administration Hospital, Boston City Hospital Pediatric Neurology Service, 1972-73. Senior Resident and Chief Resident, Boston Veterans Administration Hospital, Boston University Hospital, 1973-74.

**PROFESSIONAL POSITIONS:**

Neurologist, Adult and Pediatric Neurology Branch, Naval Regional Medical Center, Oakland, California, 1974-76. Associate and Acting Chief, Neurology Service, Martinez Veterans Administration Hospital, Martinez, California, 1976-77. Practice of Occupational and Forensic Neurology, The Medical Center, 2970 Hilltop Mall Road, Suite 203, Richmond, California, 1978 - present.

**RESEARCH AND EXPERIENCE:**

Honors Thesis. Nucleic Acid Content in the Developing Chick Embryo, Amherst College, 1965-66. National Science Foundation Summer Fellowship, nucleic acid synthesis in tumor cells, Boston University School of Medicine, 1967. Commonwealth of Massachusetts Summer Fellowship, Public Health, Lemuel Shattuck Hospital, Boston, Massachusetts, 1968. Project with Robert Efron, M.D., Professor of Neurology, University of California Davis, VA grant on hemispheric integration of dichotically presented auditory tasks, 1976-77.

**ACADEMIC APPOINTMENTS:**

Fellow in Neurology, Boston University School of Medicine, 1971-74. Assistant Professor of Neurology in Residence, University of California at Davis, 1976-77. Consultant in Neurology, Martinez Veterans Administration Hospital, Martinez, California, 1978. Assistant Clinical Professor of Neurology, University of California Hospital, San Francisco, California (UCSF), 1979-94.

**MEMBERSHIP IN PROFESSIONAL ORGANIZATIONS:**

Boston Society of Neurology and Psychiatry, 1972-74. San Francisco Neurology Society, 1974 - present. Fellow Member of American Academy of Neurology, 1976 - present. American Association of Electromyography and Electrodiagnosis, Active Member, 1978. American EEG Society, 1979. Examiner, American Association of Electromyography and Electrodiagnosis certification examination, 1980. Alameda-Contra Costa Medical Association, 1980 - present. California Medical Association, 1980 - present. American Medical Association, 1980 - present.

**LICENSES AND CERTIFICATIONS:**

Diplomate, National Board of Medical Examiners, 1971 - present. California State License Certificate G 26537, 1973 - present. Alaska State License Certificate 3809, 1997 - present. Certified, American Board of Psychiatry and Neurology (Neurology), 1976. Certified, American Association of Electromyography and Electrodiagnosis, 1978. Board Eligible, American Board of Qualification in EEG (ABQEEG), 1980. Elected to Fellowship, American Academy of Neurology, 1982. Independent Medical Examiner, plaintiff and defense counsel, personal injury, 1982. Certified American Board of Electrodiagnostic Medicine, 1990. Independent Medical Examiner, State of California, Division of Industrial Accidents, 1990. Qualified Medical Evaluator, State of California, Division of Industrial Accidents, 1991. Agreed Medical Examiner, 1991.

R. RUBENSTEIN



## **RICHARD A. RUBENSTEIN, M.D.**

Curriculum Vitae

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### **HOSPITAL APPOINTMENTS:**

Active Staff, Doctors Hospital San Pablo Campus, San Pablo, California. Courtesy Staff, Doctors Hospital Pinole Campus, Pinole, California. Courtesy Staff, East Bay Hospital, Richmond, California.

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### **BIBLIOGRAPHY:**

1. Rubenstein, R., and Benson, D.F., Treatment of Progressive Supranuclear Palsy (submitted to Journal of Neurology, Neurosurgery and Psychiatry).
2. Rubenstein, R., Treatment of Pituitary Microadenomas, Lancet 2:460, 1977.
3. Rubenstein, R., and Saryamuri, S., Conduction Aphasia with Normal Praxis. (Submitted to Cortex).

---

### **PRESENTATIONS:**

1. Saryamuri, S., and Rubenstein, R., Conduction Aphasia with Normal Praxis, presented at the San Francisco Neurologic Society meeting, Yosemite, California, May 15, 1975.
2. Rubenstein, R., Metastatic Neoplasms of the Spinal Epidural Space, presented at the San Francisco Neurologic Society meeting, Napa, California, May 21, 1977.
3. Rubenstein, R., Neurologic Complications of Mycoplasma Infections of the CNS, presented at the Western Federation of Neurologic Sciences meeting, Stanford Court Hotel, San Francisco, California, February 19, 1981.

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### **CONTACT:**

Richard A. Rubenstein, M.D., 510-222-4479, 510-222-4092 (FAX)

---

### **PERCENTAGE PLAINTIFF/DEFENSE:**

Fifty/Fifty

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### **NUMBER OF CASES:**

200

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### **TESTIMONY EXPERIENCE:**

One hundred and fifty depositions, fifteen trials, ten arbitration hearings.

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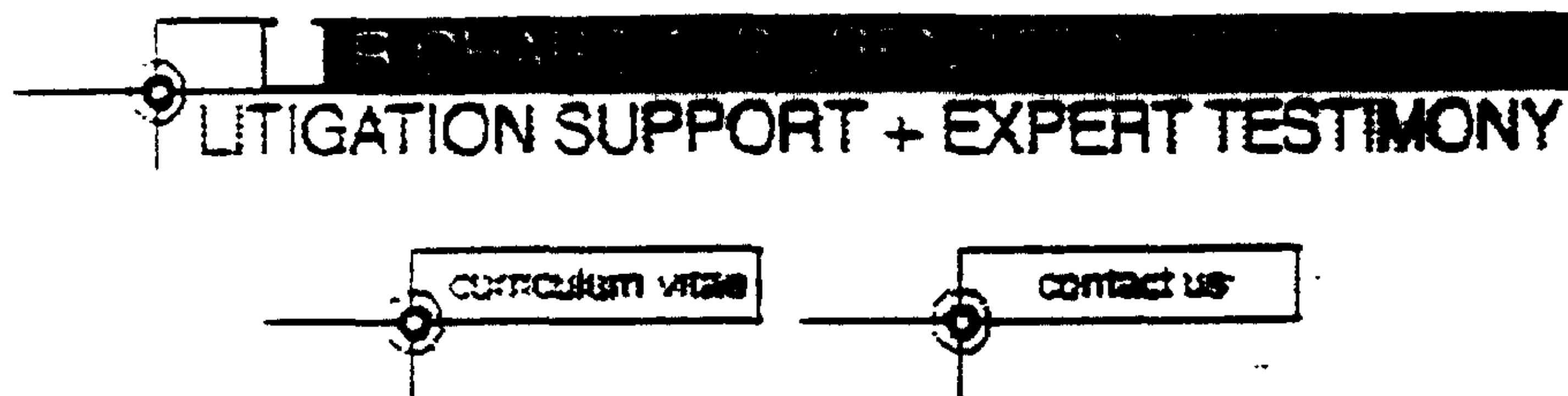
### **GEOGRAPHICAL LIMITATIONS:**

None.

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### **REFERENCES:**

From both plaintiff and defense bar upon request.



**Richard A. Rubenstein, M.D., a board certified neurologist, provides litigation support services to legal counsel, including case evaluations, medical records review, written reports, and expert testimony. An experienced litigation consultant with more than eight years experience performing personal injury evaluations, he is conversant with and current in all medical-legal issues and the dispute resolution process. He has been an expert witness both at trial and arbitration, and participated in more than 150 depositions.**

**Dr. Rubenstein's expertise in neurologic cases with special relevance to personal injury includes the following conditions:**

- **post-traumatic headache**
- **traumatic brain injury and post-concussive syndrome**
- **cervical whiplash**
- **discogenic disease in the neck and lower back**
- **peripheral nerve injury**
- **soft tissue musculoskeletal injury**
- **post-traumatic fibromyalgia syndrome**
- **traumatic spinal cord injury**
- **toxic exposure**
- **catastrophic injury**
- **medical malpractice**
- **product liability issues injurious to the nervous system**

**Dr. Rubenstein maintains his commitment to a group of core principles—quality service, timely record review, and prompt report generation—as the foundation for his increasing role in litigation support.**

- **Litigation support experience divided evenly between plaintiff and defense**
- **More than 200 cases, including 20 trials, and 15 arbitration hearings**
- **No geographical limitations on travel**



---

**RICHARD A. RUBENSTEIN, M.D.**  
**Fellow of the American Academy of Neurology**  
**Diplomate of the American Board of Electrodiagnostic Medicine**  
**The Medical Center**  
**2970 Hilltop Mall Road, Suite 203**  
**Richmond, California 94806-1947**  
**510-222-4479 phone**  
**800-426-9558 toll free**  
**510-222-4092 fax**

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## CURRICULUM VITAE

### *CLIENT AND PROFESSIONAL REFERENCES UPON REQUEST*

#### EDUCATION AND TRAINING

**B.A.** (Honors major in Biology), Amherst College, Amherst, Massachusetts, 1962-66. **Doctor of Medicine**, Boston University School of Medicine, 1966-70. **Straight Medical Internship**, St. Elizabeth's Hospital of Boston, Tufts University Medical Service, 1970-71. **Junior Assistant Resident** in Neurology, Boston University School of Medicine and Affiliated Hospitals' Neurology Residency Program, 1971-72. **Senior Assistant Resident** in Neurology, Boston Veterans Administration Hospital, Boston City Hospital Pediatric Neurology Service, 1972-73. **Senior Resident and Chief Resident**, Boston Veterans Administration Hospital, Boston University Hospital, 1973-74.

#### PROFESSIONAL POSITIONS

**Neurologist**, Adult and Pediatric Neurology Branch, Naval Regional Medical Center, Oakland, California, 1974-76. **Associate and Acting Chief**, Neurology Service, Martinez Veterans Administration Hospital, Martinez, California, 1976-77. **Practice of Occupational and Forensic Neurology**, The Medical Center, 2970 Hilltop Mall Road, Suite 203, Richmond, California, 1978-present.

#### RESEARCH AND EXPERIENCE

**Honors Thesis**. Nucleic Acid Content in the Developing Chick Embryo, Amherst College, 1965-66. **National Science Foundation Summer Fellowship**, nucleic acid synthesis in tumor cells, Boston University School of Medicine, 1967. **Commonwealth of Massachusetts Summer Fellowship**, Public Health, Lemuel Shattuck Hospital, Boston, Massachusetts, 1968. Project with Robert Efron, M.D., Professor of Neurology, University of California Davis, VA grant on hemispheric integration of dichotically presented auditory tasks, 1976-77.

#### ACADEMIC APPOINTMENTS

**Fellow** in Neurology, Boston University School of Medicine, 1971-74. **Assistant Professor** of Neurology in Residence, University of California at Davis, 1976-77. **Consultant** in Neurology, Martinez Veterans Administration Hospital, Martinez, California, 1978. **Assistant Clinical Professor** of Neurology, University of California Hospital, San Francisco, California (UCSF), 1979-94.



## MEMBERSHIP IN PROFESSIONAL ORGANIZATIONS

Boston Society of Neurology and Psychiatry, 1972-74. San Francisco Neurologic Society, 1974-present. Fellow Member of American Academy of Neurology, 1976-present. American Association of Electromyography and Electrodiagnosis, Active Member, 1978. American EEG Society, 1979. Examiner, American Association of Electromyography and Electrodiagnosis certification examination, 1980. Alameda-Contra Costa Medical Association, 1980-present. California Medical Association, 1980-present. American Medical Association, 1980-present. California Society of Industrial Medicine, 1991-present.

## LICENSES AND CERTIFICATIONS

Diplomate, National Board of Medical Examiners, 1971-present. California State License Certificate G 26537, 1973-present. Alaska State License Certificate 3809, 1997-present. Certified, American Board of Psychiatry and Neurology (Neurology), 1976. Certified, American Association of Electromyography and Electrodiagnosis, 1978. Board Eligible, American Board of Qualification in EEG (ABQEEG), 1980. Elected to Fellowship, American Academy of Neurology, 1982. Independent Medical Examiner, plaintiff and defense counsel, personal injury, 1991. Certified American Board of Electrodiagnostic Medicine, 1990. Independent Medical Examiner, State of California, Division of Industrial Accidents, 1990. Qualified Medical Evaluator, State of California, Division of Industrial Accidents, 1991. Agreed Medical Examiner, 1991.

## HOSPITAL APPOINTMENTS

Active Staff, Brookside Hospital, San Pablo, California. Active Staff, Doctors Hospital of Pinole, Pinole, California. Courtesy Staff, East Bay Hospital, Richmond, California.

## BIBLIOGRAPHY

1. Rubenstein, R., and Benson, D.F., *Treatment of Progressive Supranuclear Palsy* (submitted to Journal of Neurology, Neurosurgery and Psychiatry).
2. Rubenstein, R., *Treatment of Pituitary Microadenomas* , Lancet 2:460, 1977.
3. Rubenstein, R., and Satyamurti, S., *Conduction Aphasia with Normal Praxis* , (Submitted to Cortex).

## PRESENTATIONS

1. Satyamurti, S., and Rubenstein, R., *Conduction Aphasia with Normal Praxis* , presented at the San Francisco Neurologic Society meeting, Yosemite,



California, May 15, 1975.

2. Rubenstein, R., *Metastatic Neoplasms of the Spinal Epidural Space* , presented at the San Francisco Neurologic Society meeting, Napa, California, May 21, 1977.

3. Rubenstein, R., *Neurologic Complications of Mycoplasma Infections of the CNS* , presented at the Western Federation of Neurologic Sciences meeting, Stanford Court Hotel, San Francisco, California, February 19, 1981.

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Rev.: 3 October, 1997

## **RESUME**

**RICHARD LYNN STAGNAKER**

**RISTAL ENGINEERING, INC.  
8337 Martinsburg Road  
Mount Vernon, Ohio 43050**

740 -  
(614) 397-1698

## **PERSONAL**

**Born:** June 17, 1940, Charleston, West Virginia  
**Married:** Karin  
**Children:** Samantha, Scott  
**Social Security No.:** 233-64-4135

## **PRESENT POSITION**

**Owner and President, Ristal Engineering, Inc.  
Owner and Vice President, Highwood Farm.**

## **HIGHER EDUCATION**

**B.S.** West Virginia University, Morgantown, West Virginia, June,  
1964, Aerospace Engineering.  
**M.S.** West Virginia University, Morgantown, West Virginia,  
December, 1966, Aerospace Engineering.  
**Ph.D.** West Virginia University, Morgantown, West Virginia,  
December, 1969, Theoretical and Applied Mechanics.



### HONORS AND BIOGRAPHICAL REFERENCES

American Society for Testing and Materials (Award 1968) Sigma Xi.  
National Aeronautics and Space Administration (NASA) Research Fellowship.

### PROFESSIONAL EXPERIENCE

Dr. Stalnaker has 31 years of experience in the field of Biomechanics and has authored or co-authored over 100 articles on the subject. His work began with studies on electric field in bone and its effects on bone mass losses, and has included efforts to establish the mechanical properties of the brain, skull bone and scalp. In 1970 he conducted studies to identify impact tolerances on the head, chest and abdomen. These studies resulted in a head injury criteria, "Mean Strain Criterion" (MSC), which is now used in helmet design. Additionally, he developed a method for scaling abdominal injuries. Dr. Stalnaker has also worked on the design of child auto restraints, Anthropomorphic Test Devices (ATD) design and test equipment for standard testing. In addition to his research in this country, Dr. Stalnaker has worked three years in Europe. His first European position was at the Institut fuer Rechtsmedizin of the University of Heidelberg, West Germany. His responsibilities were to extend their cadaver impact sled testing capability and to help run these cadaver tests under contracts with the German Automotive Manufacturers Association and Volvo of Sweden. While at the Institut fuer Rechtsmedizin, Dr. Stalnaker studied autopsy technique and assisted in over one hundred autopsies on trauma victims. This work was followed by a short stay at the Instituut voor Wegtransportmiddelen (Research Institute for Road Vehicles) at TNO-Delft, The Netherlands. His responsibilities included conducting classes in Biomechanics and constructing data sets for crash victim simulation mathematical models. Dr. Stalnaker then went to work at the Laboratoire de Physiologie et de Biomechanique of the Association Peugeot-Renault, La Garenne-Colombes, France. While at Peugeot-Renault, he redesigned the Part 572 dummy's thorax for use in lateral impact. In 1979, Dr. Stalnaker returned to TNO-Delft where he developed an instrumented dummy abdomen, a child restraint system design using computer simulation, and conducted many tests at the sled laboratory using dummies and cars. While in the Netherlands, representing the Dutch, he was very active in the European Economic Community (EEC) and International Organization for Standards (ISO) committees that set standards for automobiles in Europe. Dr. Stalnaker left TNO at the end of his contract in the autumn of 1980, to take up a position at Southwest Research Institute (SwRI) in San Antonio, Texas. While at SwRI, Dr. Stalnaker carried out experiments on neck injuries and the "out of position child problem" associated with airbags. Dr. Stalnaker



also worked extensively on Crash Victim Simulations using the Madymo program.

Dr. Stalnaker became an Associate Professor at The Ohio State University in the Autumn of 1982. While at The Ohio State University, Dr. Stalnaker taught courses in instrumentation and system dynamics, as well as a course in which his students designed, built and raced a Formula Car. In 1984 Dr. Stalnaker was tenured. Dr. Stalnaker continued his research in biomechanics with emphasis on human tolerance, dummy development, and mathematical modeling. In 1994, Dr. Stalnaker was appointed to the faculty of the Department of Biomedical Engineering at The Ohio State University.

Along with these research programs, Dr. Stalnaker managed masters and Ph.D. students who worked on these projects and used this research towards their degree. Dr. Stalnaker has continued his national and international biomechanics committee work.

#### PROFESSIONAL CHRONOLOGY

Associate Research Scientist, Highway Safety Research Institute, The University of Michigan, 1968-1978.

Instrumentation Consultant, Institut fuer Rechtsmedizin, The University of Heidelberg, winter 1978.

Technical Consultant, Instituut voor Wegtransportmiddelen, TNO-Complex Zuidpolder, spring and summer 1978.

Design Engineer, Laboratoire de Physiologie et de Biomechanique, Association Peugeot-Renault, fall and winter, 1978.

Senior Biomechanical Engineer, Instituut voor Wegtransportmiddelen, TNO-Complex Zuidpolder, 1979-1980.

Senior Research Engineer, Department of Biomechanics, Southwest Research Institute, 1981-1982.

Associate Professor, Department of Mechanical Engineering, The Ohio State University, 1982-1995.

Associate Professor, Department of Biomedical Engineering, The Ohio State University, 1994-1995.

Adjunct Associate Professor, Department of Mechanical Engineering, The Ohio State University, 1995-1996.

Adjunct Associate Professor, Department of Biomedical Engineering, The Ohio State University, 1995-1996.



**PROFESSIONAL AND SCIENTIFIC ORGANIZATIONS****Memberships:**

- (1) American Society of Mechanical Engineers
- (2) Society of Automotive Engineers (SAE)
- (3) Association for the Advancement of Automotive Medicine (AAAM)

**Professional Organizations:**

- (1) Member of the Mechanical Human Simulation Task Force; Human Biomechanics and Simulation Subcommittee; Motor Vehicle Safety Systems Testing Committee; Society of Automotive Engineers.
- (2) Member of the Analytical Human Simulation Task Force; Human Biomechanics and Simulation Subcommittee; Motor Vehicle Safety Systems Testing Committee; Society of Automotive Engineers.
- (3) Member of Working Group 1, Child Restraint Systems (in road vehicles), Sub-Committee 12, Technical Committee 22, International Standards Organization.
- (4) Member of Working Group 5, Anthropomorphic Test Devices, Sub-Committee 12, Technical Committee 22, International Standards Organization.
- (5) Member of Working Group 6, "Criteres de performance exprimes en terme de biomechanique", Sub-Committee 12, Technical Committee 22, International Standards Organization.
- (6) Member of the United States Advisory Committee to Working Group 5 & 6.
- (7) Reviewer for Reader's Committee, Passenger Protection Committee, Society of Automotive Engineers.
- (8) Member of the Stapp Conference Advisory Committee.
- (9) Member of the "Injury Research Grants Review Committee", Centers for Disease Control, Division of Injury Epidemiology and Control.
- (10) Reviewer for Accident Analysis & Prevention.
- (11) Reviewer for American Society of Mechanical Engineers.
- (12) Guest Lecturer for SAE Seminar on Anthropomorphic Test Devices.
- (13) Member, editorial board, Safe Ride News.

**PATENTS**

"Lateral Impact Thorax", (Renault) France, 1980.

"Tip-up Table, Child Restraint System", Germany, 1980.



PUBLICATIONS

"Electric Fields and Bone Loss of Disuse", Journal of Biomechanics, Vol. 1, No. 1, pp 47-52, January, 1968.

"Head Injury Tolerance for Linear Impacts by Mechanical Impedance Methods", The American Society of Mechanical Engineers, Paper No. 70-WA/SHF-4, New York, New York, Winter Annual Meeting, November-December, 1970.

"Driving Point Impedance Characteristics of the Head", Journal of Biomechanics, Vol. 4, No. 2, pp 127-139, March, 1971.

"Door Crashworthiness Criteria", Proceedings, 15th Stapp Car Crash Conference, pp 489-517, Coronado, California, November, 1971.

"MSC Tolerance Curve for Human Head Impacts", The American Society of Mechanical Engineers, Paper No. 71-WA/SHF-10, New York, New York, Winter Annual Meeting, November - December, 1971.

"Biomechanical Aspects of Head Injury", Human Impact Response Measurement and Simulation, pp 85-112, Plenum Press, New York-London, 1973.

"Human Torso Response to Blunt Trauma", Human Impact Response Measurement and Simulation, pp 181-199, Plenum Press, New York-London, 1973.

"Injury Tolerance Levels in Blunt Abdominal Trauma", Proceedings, International Conference on the Biomechanics of Impacts, pp 431-440, Amsterdam, The Netherlands, June, 1973.

"Impact Injury Mechanism in Abdominal Organs", Proceedings, 17th Stapp Car Crash Conference, pp 115-126, Oklahoma City, Oklahoma, November, 1973.

"Mechanical Impedance Response of the Prototype and Production Anthropomorphic Dummy Heads", Vehicle Safety Research, Ann Arbor, Michigan, November, 1973.

"Side Impact Tolerance to Blunt Trauma", Proceedings, 17th Stapp Car Crash Conference, pp 377-408, Oklahoma City, Oklahoma, November, 1973.

"The Mechanism of Injury in Blunt Abdominal Trauma", Journal of Trauma, Vol. 13, No. 11, pp 962-970, November, 1973.

"Evaluation of Current Production and Prototype Child Restraint Systems in the U.S.A.", Proceedings of the International Meeting on Biomechanics of Trauma in Children, pp 288-300, Lyon, France, September, 1974.



"Otolologic Hazards of Airbag Restraint System", Proceedings, 18th Stapp Car Crash Conference, pp 339-349, Ann Arbor, Michigan, December, 1974.

"Dynamic and Static Load Response of The Head", Second International conference of the International Research Committee on the Biokinetics of Impacts, pp 1-19, Birmingham, England, September, 1975.

"Impact Response and Tolerance of the Lower Extremities", Proceedings, 19th Stapp Car Crash Conference, pp 543-559, San Diego, California, November, 1975.

"Performance Evaluation of Child Dummies and Baboons in Child Restraint Systems in a Systemized Crash Environment", Proceedings, 19th Stapp Car Crash Conference, pp 345-403, San Diego, California, November, 1975.

"Human Tolerance of Lower Extremities Impacts", Proceedings, International Conference on the Biokinetics of Impacts, pp 362-374, Amsterdam, The Netherlands, September 1976.

"The Prediction of Thoracic Impact Injuries", Proceedings, 20th Stapp Car Crash Conference, pp 637-729, Dearborn, Michigan, October, 1976.

"A High-Speed Cine-radiographic Technique for Biomechanical Impact", Proceedings, 20th Stapp Car Crash Conference, pp 767-781, Dearborn, Michigan, October, 1976.

"Measurement of Head Impact Response", Proceedings, International Conference on the Biokinetics of Impacts, pp 152-162, Berlin, West Germany, September, 1977.

"Prediction of Multidirectional Thoracic Impact Injuries", Proceedings, International Conference on the Biokinetics of Impacts, International Conference on Impact Trauma, pp 281-285A, Berlin, West Germany, 1977.

"Head Impact Response", Proceedings, 21st Stapp Car Crash Conference, pp 305-335, New Orleans, Louisiana, October, 1977.

"Impact Trauma of the Human Temporal Bone", Journal of Trauma, Vol. 17, No. 10, pp 761-766, October, 1977.

"Protection of Child Occupants in Automobile Crashes", Proceedings, 22nd Stapp Car Crash Conference, pp 671-695, Ann Arbor, Michigan, October, 1978.

"Child Auto Restraint Design Principles", Journal of Products Liability, Vol. 2, pp 43-53, 1978.



"Child Restraint Evaluation by Experimental and Mathematical Simulation", Proceedings, 23rd Stapp Car Crash Conference, pp 383-415, San Diego, California, 1979.

"Modification of Part 572 Dummy for Lateral Impact According to Biomechanical Data", Proceedings, 23rd Stapp Car Crash Conference, pp 841-872, San Diego, California, October 1979.

"Mechanisms of Femoral Fracture", Journal of Biomechanics, Vol. 13, No. 8, pp 701-715, August, 1980.

"MADYMO Used for Computer Aided Design of a Dynamic Acting Child Restraint Seat", Vth International IRCOBI Conference, pp 107-116, Birmingham, England, September, 1980.

"Designing of a Dummy's Abdomen for Detecting Injuries in Side Impact Collisions", Vth International IRCOBI Conference on Biomechanics of Impacts, pp 149-164, Birmingham, England, September, 1980.

"Comparison Study of Two 3-year-old Child Dummies (Part 572 and P3) in a Harness Type Child Restraint System", Vth International IRCOBI Conference on the Biomechanics of Impacts, pp 321-330, Salon de Provence, France, September, 1981.

"Development of a Dummy Abdomen Capable of Injury Detection in Side Impacts", Proceedings, 25th Stapp Car Crash Conference, pp 651-682, San Francisco, California, September, 1981.

"Unrestrained, Front Seat, Child Surrogate Trajectories Produced by Hard Braking", Proceedings, 26th Stapp Car Crash Conference, pp 231-247, Ann Arbor, Michigan, October, 1982.

"Crash Victim Simulation - A First Step in Child Auto Safety", Proceedings, SAE Child Dummy and Restraint Conference, pp 135, 145-162, San Diego, California, October, 1983.

"The Application of the New Mean Strain Criterion (MNSC)", 1985 International IRCOBI/AAAM Conference on the Biomechanics of Impacts, pp 191-209, Goteborg, Sweden, June, 1985.

"Abdominal Trauma -- Review, Response, and Criteria", Proceedings, 29th Stapp Car Crash Conference, pp 1-16, Washington, D.C., October, 1985.

"Evaluation of the AIS as a Measure of Probability of Death", Proceedings of the 1986 International IRCOBI Conference on the Biomechanics of Impacts, pp 105-119, Zurich, Switzerland, September, 1986.



"A Lumped Parameter Approach to Simulate the Rotational Head Motion", 1987 International IRCOBI Conference on the Biomechanics of Impacts, pp 203-215, Birmingham, England, September, 1987.

"Translational Energy Criteria and It's Correlation with Head Injury in the Sub-Human Primate", 1987 International IRCOBI Conference on the Biomechanics of Impacts, pp 223-238, Birmingham, England, September, 1987.

"The Biofidelity of the Eurosid Neck", 1987 International IRCOBI Conference on the Biomechanics of Impacts, pp 263-283, Birmingham, England, September, 1987.

"Parametric Studies of the Translational Head Injury Model", 1988 International IRCOBI Conference on the Biomechanics of Impacts, pp 181-194, Germany, September 14-16, 1988.

"Sensitivity Analysis for the Translational Energy Criteria: Overall Head Injuries", Proceedings, International Conference on the Biomechanics of Impacts, pp 13-25, Stockholm, Sweden, September, 1989.

"A Practical Application of the Translational Energy Criteria: Evaluation of Baseball and Softball Head Impact Injury Potentials", Proceedings of the 1990 International IRCOBI Conference on the Biomechanics of Impacts, pp 225-244, Bron, France, September, 1990.

"A Development of Approximate Impedance Functions to Estimate General Human Head Impact Response for Off-Axis Impacts", Proceedings of the 1991 International IRCOBI Conference on the Biomechanics of Impacts, pp 63-75, Germany, September, 1991.

"A Constitutive Relationship for Large Deformation Finite Element Modeling of Brain Tissue", accepted for publication in Journal of Biomechanical Engineering, April 1993.

"Validation Study of Translational Energy Criteria", American Society of Mechanical Engineers Joint Applied Mechanics and Materials Summer Conference, AMD-MD '95 Abstracts, p. 414, Los Angeles, California, June 28-30, 1995.

"Real World Side Impact Accidents with Children in Infant and Child Restraint Systems", Third International Conference of Injury Prevention and Control, Melbourne, Australia, February, 1996.

"Development of Child Head Injury Criteria I-Translational Head Injury Model (THIM)", submitted for review for publication in the Journal of Biomechanical Engineering, pp 1-24.



"Development of Child Head Injury Criteria II-Translational Energy Criteria (TEC)", submitted for review for publication in the Journal of Biomechanical Engineering, pp 1-14.

"The Translational Energy Criteria: A Validation for Non-Fracture Head Impacts", pending revisions for publication in the Proceedings, 41st Stapp Car Crash Conference, Lake Buena Vista, Florida, November, 1997.

PRESENTATIONS AND ABSTRACTS

"Secondary - Injection of Reacting Gas", The 1964 Middle Atlantic Student Conference of the AIAA, Drexel Institute of Technology, Philadelphia, Pennsylvania, Abstract, April, 1964.

"Dynamic Mechanical Properties of Scalp and Brain", Proceedings, Rocky Mountain Biomechanics Symposium, pp 67-73, Laramie, Wyoming, May, 1970.

"A Mechanical Impedance Model for Head Injury Due to Linear Impacts", 1970 Proceedings, Symposium on Biodynamic Models and Their Applications, pp 905-931, Dayton, Ohio, 1971.

"The Biomechanical Aspects of Crash Helmet Design", Proceedings, AGARD Conference, June, 1971.

"Human Side Impact Tolerances Obtained from Sub-human Primate Scaling Relationship", Proceedings, 24th Annual Conference in Engineering in Medicine and Biology, pp 307-308, Las Vegas, Nevada, October-November, 1971.

"Automobile Races - A Proving Ground for Restraint System Effectiveness", Speaking text of presentation at the 4th International Congress of Accident Medicine, Paris, France, September, 1972.

"A Brain Injury Model for Crash Helmet Design", Proceedings, 18th Annual Meeting of the Institute of Environmental Sciences, 1972.

"Test of Current and Experimental Child Restraint Systems", Society of Automotive Engineers, Paper No. 740045, Detroit, Michigan, February-March, 1974.

"A Technical Analysis of Complications Following External Cardiac Massage", 1974 SAMA/UTMB National Student Research Forum, Galveston, Texas, 1974.

"Human Chest Impact Protection Criteria", Society of Automotive Engineers, Paper No. 750589, Detroit, Michigan October, 1975.

"Basic Design Principles of Child Auto Restraints", Society of Automotive Engineers, Paper No. 740936, Toronto, Canada, October, 1974.

"Occupant Injury Assessment Criteria", Society of Automotive Engineers, Paper No. 750914, Detroit, Michigan, October, 1975.

"Head Injury Evaluation: Criteria for Assessment of Field, Clinical and Laboratory Data", Proceedings, American Association of Automotive Medicine, pp 168-179, San Diego, California, November, 1975.



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"Human Injury Mechanisms and Impact Tolerance", Design for Crash Survival of Automobile Occupants, Transportation Research Record 586, Transportation Research Board, Washington, D.C., 1976.

"Practical Aspects of Child Safety Restraint System Standards", Presented at the 5th International Congress on Automotive Safety, San Francisco, California, 1975.

"Side Impact Response and Injury", 6th International Technical Conference on Experimental Safety Vehicles, pp 681-689, Washington, D.C., October, 1976.

"Human Temporal Bone Impact Trauma", Proceedings, 20th American Association of Automotive Medicine, Atlanta, Georgia, October, 1976.

"Child Auto Restraint Design Principles", The Southeastern Conference on Safe Product Design and Failure Analysis, pp 43-57, Durham, North Carolina, November, 1977.

"Evaluation of Intrathoracic Response Using High-Speed Cine-radiography", Proceedings, 6th New England Biomechanical Engineering Conference, Kingston, Rhode Island, March, 1978.

"Presentation of a Frontal Impact and Side Impact Dummy, Defined from Human Data and Realized from a 'Part 572' Basis", Proceedings, 7th International Technical Conference on Experimental Safety Vehicles, pp 407-416, Paris, France, June, 1979.

"Comparison Study of Two 3-year-old Child Dummies: The Part 572 and the P3", Proceedings, 25th American Association for Automotive Medicine, pp 397-406, San Francisco, California, October, 1981.

"Development of Neck Injury Tolerance Criteria in Human Surrogates. I. Static Tensile Loading in the Baboon Neck: Preliminary Observations", Proceedings, 9th International Technical Conference on Experimental Safety Vehicles, pp 279-286, Kyoto, Japan, November, 1982.

"Interpretation of Neck Loads Transduced by Advanced Anthropomorphic Test Dummies. I. Biomechanical Data", Proceedings, Second Southern Biomedical Engineering Conference, pp 1-4, San Antonio, Texas, September, 1983.

"Application of The Mean Strain Criteria (MSC)", Proceedings, 12th Annual International Workshop on Human Subjects for Biomechanical Research, pp 173-189, Chicago, Illinois, November, 1984.



"AIS and Probability of Death", Proceedings, 12th Annual International Workshop on Human Subjects for Biomechanical Research, pp 11-30, Chicago, Illinois, November, 1984.

"Impact Biomechanics at The Ohio State University", Proceedings, Injury Biomechanics. Government/Industry Meeting and Exposition, SAE Publication SP-731, pp 63-70, Washington, D.C., May 18-21, 1987.

"International Funding, Training and Laboratory Facility: Getting the Job Done", Panel Discussion: Proceedings, Injury Biomechanics Government/Industry Meeting and Exposition, SAE Publication SP-731, pp 189-204, Washington, D.C., May 18-21, 1987.

"Size, Weight and Biomechanical Impact Response Requirements for Adult Size Small Female and Large Male Dummies", Proceedings, International Congress and Exposition, SAE Publication SP-782, pp 133-144, Detroit, Michigan, February 27-March 3, 1989.

"Multi-Directional Dummy Neck Prototype", Proceedings, 12th International Conference on Experimental Safety Vehicles, pp 645-649, Goteborg, Sweden, May 24-June 1, 1989.

"A Child Dummy Family For Future Child Restraint Evaluation", Prepared for: Special Workshop on the Theme "Future in Child Restraints", Co-organized by National Highway Traffic Safety Administration and the International Research Council on Biokinetics of Impacts, Stockholm, Sweden, September 15, 1989.

"The Unified Head Injury Theory", First World Congress of Biomechanics, Volume II, pp 259, La Jolla, California, August 30 - September 4, 1990.

"State of the Art of Rotational Head Injury Modeling", 1st Annual National Biomechanical Symposium on Injury Prevention Through Biomechanics, pp 105-112, Wayne State University, April 11-13, 1991.

"Development of A Multisized Hybrid III Based Dummy Family", 2nd Annual Injury Prevention Through Biomechanics Symposium, pp 49, Wayne State University, April 10, 1992.

"The Unified Head Injury Theory", Proceedings, 1992 Engineering Systems Design and Analysis Conference, Vol. 2, pp 105-114, Istanbul, Turkey, June 29-July 3, 1992.

"Validation of Translational Energy Criteria", Proceedings of the 3rd Injury Prevention through Biomechanics Symposium, pp 13-24, Atlanta, Georgia, May 20-23, 1993.

"Validation of Translational Energy Criteria", Abstracts of The Second World Conference On Injury Control, pp 28-29, Atlanta, Georgia, May 20-23, 1993.



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"Spinal Cord Injuries To Children In Real World Accidents", Proceedings of the Child Occupant Protection Symposium, pp 173-183, San Antonio, Texas, November 7-8, 1993.

"Inconsistencies in State Laws and Federal Regulations Regarding Child Restraint Use in Automobiles", Proceedings of the Child Occupant Protection Symposium, pp 51-69, San Antonio, Texas, November 7-8, 1993.

"Validation Study of Translational Energy Criteria", American Society of Mechanical Engineers Joint Applied Mechanics and Materials Summer Meeting, AMD - Vol. 205, Impact, Waves, and Fracture, pp 327-350, Los Angeles, California, June 28-30, 1995.

"Using Unembalmed Cadavers in Controlled Impact Studies", Presented at the Third European Congress of Clinical Anatomy, Innsbruck, Austria, September 6-9, 1995.

"Using Unembalmed Cadavers in Controlled Impact Studies," Surgical and Radiologic Anatomy: Journal of Clinical Anatomy, Vol. 17, Number 3, November 3, 1995.

"Technical and Biomechanical Issues in Child Car Seat Cases", Presented at the ABA Emerging Issues in Motor Vehicle Product Liability Litigation, Phoenix, Arizona, March 28-29, 1996.

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REPORTS

"Electric Fields and Calcium Mobility in Bone", West Virginia University, Morgantown, West Virginia, Final Report, NASA, Grant No. NaG-533, Sub-project B, September, 1966.

"Determination of the Physical Properties of Tissues", West Virginia University, Morgantown, West Virginia, Progress Report, National Institute of Neurological Disease and Blindness, Contract No. PH 43-67-1137, August, 1968.

"Mechanical Properties of the Head", West Virginia University, Morgantown, West Virginia, Dissertation, September, 1969.

"Door Crashworthiness Criteria", National Technical Information Service, Springfield, Virginia, 22151, Final Report, DOT-ES-800 534, June, 1971.

"Human Tolerance", Part 1 & 2, Motor Vehicle Manufacturers Association, Detroit, Michigan, Highway Safety Research Institute, Final Report, 1971.

"Impact Tolerance - Abdominal Injury", Highway Safety Research Institute, The University of Michigan, Ann Arbor, Michigan, Final Report No. HSRI-71-102, Vol. 1 & 2, June, 1971.

"Evaluation of Current Child Restraint Systems", Highway Safety Research Institute, The University of Michigan, Ann Arbor, Michigan, Prepared for Consumers Union of U.S., Inc., Auto Test Division, 367 Boston Post Road, Orange, Connecticut, 06477, April, 1972.

"Side Impact Tolerance to Blunt Trauma", Motor Vehicle Manufacturers Association, Detroit, Michigan, Final Report, 1972.

"Dummy Head Mechanical Impedance Test", Ann Arbor, Michigan, Highway Safety Research Institute, 1972.

"Door Crashworthiness Criteria", National Technical Information Service, Springfield, Virginia, 22151, Final Report, DOT-ES-800 924, September, 1973.

"Dynamic Performance of Child Restraint Systems", Highway Safety Research Institute, The University of Michigan, Ann Arbor, Michigan, Prepared for Consumers Union of U.S., Inc., Auto Test Division, 367 Boston Post Road, Orange, Connecticut, 06477, October, 1973.

"Fabrication of a Standard Bench Vehicle Seat", Highway Safety Research Institute, The University of Michigan, Ann Arbor, Michigan, Final Report No. UM-HSRI-II-74-5, Vol. 1,2,3,4,5, September, 1974.



"Test Report for the National Highway Traffic Safety Administration on the Infant Simulator - Mark 2 (S/N 3-3)", Highway Safety Research Institute, The University of Michigan, Ann Arbor, Michigan. Final Report, 1974.

"Test Report for the National Highway Traffic Safety Administration on the Infant Simulator - Mark 2 (S/N 3-2)", Highway Safety Research Institute, The University of Michigan, Ann Arbor, Michigan. Final Report, 1974.

"Test Report for the National Highway Traffic Safety Administration on the Infant Simulator - Mark 2 (S/N 3-1)", Highway Safety Research Institute, The University of Michigan, Ann Arbor, Michigan. Final Report, 1974.

"Vascular System Pressurization Techniques", Highway Safety Research Institute, The University of Michigan, Ann Arbor, Michigan. Final Report No. UM-HSRI-76-35, October, 1976.

"Tolerance and Response of the Knee - Femur - Pelvis Complex to Axial Impact", Highway Safety Research Institute, The University of Michigan, Ann Arbor, Michigan. Final Report No. UM-HSRI-76-33, October, 1976.

"Survey of the Performance of Infant Auto Restraint Systems Sold in the United States and Canada", Highway Safety Research Institute, The University of Michigan, Ann Arbor, Michigan. Final Report No. UM-HSRI-77-21, Vol. 1,2,3 & Film, May, 1977.

"Femur Impact Study", Highway Safety Research Institute, The University of Michigan, Ann Arbor, Michigan. Final Report No. UM-HSRI-77-25, May, 1977.

"Head Injury Research Program - Human Cadaver Head Impact", Highway Safety Research Institute, The University of Michigan, Ann Arbor, Michigan. Final Report No. UM-HSRI-77-41, June, 1977.

"A Report of Impact Tests Conducted for Bobby-Mac Co., Inc.", Tandelita Associates, Ann Arbor, Michigan, August, 1977.

"Validation Studies for Head Impact Injury Model, Highway Safety Research Institute, The University of Michigan, Ann Arbor, Michigan. Final Report No. DOT HS-802 566, September, 1977.

"Safety Helmet - Head Interaction Study Using High-Speed Cineradiography", Highway Safety Research Institute, The University of Michigan, Ann Arbor, Michigan. Final Report No. UM-HSRI-77-48, Film, October, 1977.



"Feasibility of Investigating the Mechanisms of Aortic Trauma using High - Speed Cineradiography - A Pilot Study", Highway Safety Research Institute, The University of Michigan, Ann Arbor, Michigan, Final Report No. UM-BSRI-77-53, December, 1977.

"Lecselbiomechanica", Instituut voor Wegtransportmiddelen, TNO, Delft, Nederland, Lectures, July, 1978.

"Modification of Hybrid II Thorax for Lateral Impact", Laboratoire de Physiologie et de Biomechanique de L'Association Peugeot-Renault, 18 Rue des Fauvelles, 92250 La Garenne-Colombes, France, Final Report, January, 1979.

"TNO - Full Scale Crash Facility Instrumentation Checkout - Crash Test Volvo 343 DL", Instituut voor Wegtransportmiddelen, TNO, Delft, Nederland, Report No. 700710102 A, August, 1979.

"TNO - Full Scale Crash Facility Instrumentation Checkout - Crash Test Volvo 343 DL", Instituut voor Wegtransportmiddelen, TNO, Delft, Nederland, Report No. 700710102 B, August, 1979.

"TNO - Full Scale Crash Facility Instrumentation Checkout - Crash Test Volvo 343 DL", Instituut voor Wegtransportmiddelen, TNO, Delft, Nederland, Report No. 700710102 C, August, 1979.

"Construction, Validation and Sensitivity Analysis of Child-Restraint Model", Instituut voor Wegtransportmiddelen, TNO, Delft, Nederland, Report No. 700120002-B, 1980.

"Frontal and Lateral Comparison Tests on PSA/Renault Lateral Dummy Equipped with Part 572 and Hybrid III Ribs", Instituut voor Wegtransportmiddelen, TNO, Delft, Nederland, Final Report No. 7001230003-7, 1980.

"Development of Anthropomorphic Test Dummies for Frontal and Lateral Collisions-Development of Abdominal Injury Detection", Instituut voor Wegtransportmiddelen, TNO, Delft, Nederland, Final Report No. 700120003-6, 1980.

"Submerging Sled Tests Part 572 Pelvis Without PSA/Renault Submerging Transducers and PSA/Renault Modified Part 572 Pelvis with Submerging Transducers", Instituut voor Wegtransportmiddelen, TNO, Delft, Nederland, Report No. 70012003-7, 1980.

"Unrestrained, Front Seat, Child Surrogate Trajectories Produced by Hard Braking", Southwest Research Institute, San Antonio, Texas, Final Report II-6014, September, 1981. (Industrial Confidential).



10/03/97 13:19 FAX 16143 7157

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17

"Computer Simulation of a Child During Panic Braking", Southwest Research Institute, San Antonio, Texas, Report No. 14-9341, March, 1983. (Industrial Confidential).

"Brain Injury Prediction Using the Translational Energy Criterion: An Experimental Study", NHTSA Report No. DOT HS 808 093, National Highway Traffic Safety Administration, August, 1992.

"Translational Energy Criteria: Development and Applications", VRTC SRL-096, NHTSA Final Report, National Highway Traffic Safety Administration, U.S. Department of Transportation, 10 Year Report, Pending NHTSA Approval, 1992.

"An Overview of the Mean Strain Criterion Development", VRTC 91-SA-W-21, 1992.

"An Overview of the Mean Strain Criterion Development", VRTC-88-0107, Report No. 880107-01, pending publication by NHTSA, 1993.

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**CURRICULUM VITAE  
GARY K. STIMAC****1. PERSONAL DATA**

Name: Gary K. Stimac  
Date of Birth: May 14, 1948  
Place of Birth: San Francisco CA  
Citizenship: USA  
Address: Imaging Network of Seattle  
12600 SE 38th Street, Suite 200  
Bellevue, WA 98006  
Phone: (425) 644-3300  
Fax: (425) 644-3311

**2. EDUCATION**

1966-70 Massachusetts Institute of Technology B.S., Physics  
Cambridge, MA  
1970-75 Massachusetts Institute of Technology M.S., Physics  
Cambridge, MA  
1975-79 University of Iowa College of Medicine M.D.  
Iowa City, IA  
1978-79 Massachusetts Institute of Technology Ph.D., Physics  
Cambridge, MA

**3. POSTGRADUATE TRAINING**

1979-80 University of California Internship (Medicine)  
San Francisco, CA  
1980-83 University of California Residency (Radiology)  
San Francisco, CA  
1983-84 University of California Fellowship (Neuroradiology)  
San Francisco, CA

**4. FACULTY POSITIONS**

1973-74 Instructor, Physics Department  
Massachusetts Institute of Technology, Cambridge, MA  
1983-84 Clinical Instructor, Neuroradiology  
Department of Radiology, University of California  
San Francisco, CA  
1984-87 Assistant Professor of Radiology  
University of Washington, Seattle, WA  
1984-87 Adjunct Assistant Professor of Neurosurgery  
University of Washington, Seattle, WA



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## 5. HOSPITAL and CLINIC POSITIONS

1984-1987	Medical Staff, University Hospital and Harborview Medical Center
1984-1988	Consultant in Neuroradiology, Veteran's Administration Medical Center, Seattle, WA
1985 and 1986	Director, Neuroimaging Section, Department of Radiology University of Washington Hospitals, Seattle, WA
1985 and 1986	Director, Neuroradiology Fellowship Program Department of Radiology, University of Washington Hospitals, Seattle, WA
1985-1988	Director of Neuroimaging First Hill Diagnostic Imaging Center, Seattle, WA
1986-1988	Consultant in Neuroradiology, Children's Hospital and Medical Center, Seattle, WA
1987-1988	Courtesy Hospital Staff, Department of Radiology Harborview Medical Center, Seattle, WA
1988 and 1989	Clinical Director, North Shore Magnetic Imaging Center, Boston, MA
1989-1995	Neuroradiologist, First Hill Diagnostic Imaging Center, Seattle, WA
1994 and 1995	Medical Director, Open MRI of Bellevue, Bellevue, WA
1990-present	President, Imaging Network of Seattle, Seattle, WA
1990-present	Courtesy Hospital Staff, Central Peninsula General Hospital, Soldotna, AK
1994-present	Courtesy Hospital Staff, Swedish Hospital Medical Center, Seattle, WA

## 6. HONORS

1970-71	National Science Foundation Research Traineeship Physics Department, Massachusetts Institute of Technology, Cambridge, MA
1976	School of Medicine Research Fellowship University of Iowa, Iowa City, IA
1978-79	Whitaker Foundation Health Sciences Fellowship Joint Program in Health Science and Technology Harvard Medical School and the Massachusetts Institute of Technology, Cambridge, MA
1983	Second Conference on Biological Imaging Fellowship National Academy of Sciences, Washington, D.C.
1983-84	Fellowship in Neuroradiology for development of magnetic resonance imaging. Diasonics Inc and University of California, San Francisco CA
1988	Magna Cum Laude Award for Scientific Exhibit. Stimac, G.K., Sundsten, J.W., Prothro, J.S., Gerlach, R., Sorbonne R.: Contour reconstructions in three-space of the skull, face, and brain from CT, MR, and anatomic sections. American Society of Neuroradiology, Chicago IL, 1988.



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**GRANTS**

- 1985 Division of Research in Medical Education Grant  
IBM computer system for use in neuroradiology education.  
Principal Investigator, G.K. Stimac  
School of Medicine, University of Washington. \$7000.
- 1985 Biomedical Research Support Grant  
Clinical investigation in neuroradiology.  
Principal Investigator, G.K. Stimac  
University of Washington. \$27,000.
- 1985 Alzheimer's Clinical Research Center Grant  
Pilot investigations in imaging of Alzheimer's disease using  
magnetic resonance techniques.  
Principal Investigator, G.K. Stimac  
University of Washington. \$2000.
- 1985 Berlex Laboratories Investigational Drug Study  
Phase III clinical trials of Gadolinium-DTPA for use as  
magnetic resonance paramagnetic contrast agent in the  
evaluation of mass lesions in the brain.  
Principal Investigator, G.K. Stimac  
University of Washington and First Hill Diagnostic Imaging  
Center. \$45,600.
- 1986 Small Business Investigational Research (SBIR) Grant  
Development of computer-automated photography of CT scans  
using menu-driven commands based on scanning protocols.  
Principal Co-Investigators, G.K. Stimac and Alan Rowberg  
In collaboration with Tecon Corporation, Renton, WA. \$50,000.
- 1986 Berlex Laboratories Drug Study  
Evaluation of iodinated contrast for CT scanning.  
Principal Investigator, G.K. Stimac  
First Hill Diagnostic Imaging Center, Seattle, WA \$1000.
- 1986 Summer Research Fellowship  
Student research project by Ralph Sorbonne  
Three-dimensional computerized imaging of the skull.  
Coinvestigators, J. Gehrig and G.K. Stimac  
University of Washington School of Dentistry. \$2600.
- 1986 Berlex Laboratories Investigational Drug Study  
Phase III clinical trials of Gadolinium-DTPA for use as  
magnetic resonance paramagnetic contrast agent in the  
evaluation of spine disease.  
Principal Investigator, G.K. Stimac  
University of Washington and First Hill Diagnostic Imaging  
Center. \$44,000.



- 1986 Biomedical Research Support Grant  
NMR spectroscopic evaluation of experimental allergic encephalitis, a model for multiple sclerosis.  
Principal Investigator, Todd Richards; Coinvestigators, G.K. Stimac and G. Wesbey.  
University of Washington, Department of Radiology. \$16,000.
- 1986 General Electric Investigational Study  
Xenon-enhanced CT scanning to map cerebral blood flow in elderly patients  
Principle Investigator, G.K. Stimac  
University of Washington  
Consignment use of Xenon-CT blood flow unit  
Research support funds \$8,500.
- 1987 NIH, Radiology Study Section  
NMR spectroscopic evaluation of experimental allergic encephalitis, a model for multiple sclerosis.  
Principal Investigator, T. Richards; Coinvestigator, G. Wesbey; Consultant, G.K. Stimac.  
University of Washington, Department of Radiology. \$300,000.
- 1987 NINCDS Program "AIDS Dementia and Other AIDS-Associated Neurological Disorders".  
Neuropsychological aspects of HIV infection.  
Principle Investigator, H.H. Handsfield; Co-Investigators, A.C. Collier, B.D. Townes, F. Bahls, R.W. Coombs, G.K. Stimac  
Department of Medicine, University of Washington. \$800,000.

## 8. BOARD CERTIFICATION

- 1980 Diplomate, National Board of Medical Examiners  
1983 Diplomate, American Board of Radiology  
1984 Fellow, Royal College of Physicians of Canada  
1986 Senior Member, American Society of Neuroradiology

## 9. LICENSURE TO PRACTICE - All licenses are current

- 1981 California Medical License No: G044908  
1984 Washington State Medical License No: 0021768  
1984 Fellow, Royal College of Physicians of Canada  
1988 Massachusetts Medical License No: 58944  
1990 Alaska Medical License No: AA2622  
1993 Nevada Medical License No: 6737



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**ORGANIZATIONS**

1980 Sigma Xi, Scientific Research Society  
 1982 Radiological Society of North America  
 1984 American Society of Neuroradiology  
 1984 Royal College of Physicians of Canada  
 1985 Association of University Radiologists  
 1985 Western Neuroradiological Society  
 1986 King County Medical Society, Seattle  
 1986 Washington State Medical Society  
 1986 American Medical Association  
 1986 International Society of Magnetic Resonance

**11. SPECIAL RESPONSIBILITIES**

1972-73 Member, Committee on the Undergraduate Physics Curriculum  
 Massachusetts Institute of Technology  
 1984 Program coordinator and faculty speaker  
 Eastern Washington Symposium on Magnetic Resonance Imaging  
 Eastern Washington Radiological Society, Spokane Society of  
 Neurological Science, and Spokane Society of Internal  
 Medicine. Spokane, WA  
 1985 Faculty member  
 Radiology Northwest Symposium  
 Continuing Medical Education  
 University of Washington, Seattle, WA  
 ~1985 Faculty member  
 Alzheimer's Disease Symposium  
 Continuing Medical Education  
 University of Washington, Seattle, WA  
 1986 Faculty member  
 Magnetic resonance: its function and promise  
 Continuing Medical Education  
 University of Washington, Seattle, WA  
 1986 Neuroradiology consultant  
 Frank Walsh Society International Meeting in Ophthalmology  
 Seattle, WA  
 1986 Moderator, Head and Neck Session  
 Pacific Northwest Radiological Society, Seattle, WA  
 1986 Member, Search Committee for Chief of Radiology  
 Harborview Medical Center  
 1987 Neuroradiology consultant  
 Continuing Medical Education in Ophthalmology  
 Virginia Mason Clinic, Seattle, WA  
 1987 Faculty member  
 Current Topics of Magnetic Resonance Imaging  
 Continuing Medical Education  
 University of Washington, Seattle, WA  
 1987 Otolaryngology, Head and Neck Surgery monthly neuroradiology  
 conference. University of Washington, Seattle, WA



- 37 Interactive Computer Graphics in Biological Structure.  
Poster session. In Symposium on Biomedical Advances through  
the use of Modern Imaging Methods. University of  
Washington, Seattle, WA
- 1987 Faculty member  
Medico-Legal Aspects of Neurology  
Continuing Medical Education  
University of Washington, Seattle, WA, and  
Washington State Association of Defense Counsel
- 1988 Moderator  
MR Contrast Materials  
American Society of Neuroradiology  
Annual Meeting, Chicago, IL
- 1988-89 Visiting Radiologist - MR of Head and Neck Disease  
Massachusetts Eye and Ear Infirmary, Boston, MA
- 1989 Consultant in Neuroradiology and Magnetic Resonance Imaging  
University of New Mexico, Albuquerque, NM
- 1990 Visiting Professor in Neuroradiology,  
Tufts New England Medical Center, Boston, MA
- 1990 Magnevist Consensus Meeting, Applications and Clinical Use  
of Gd-DTPA in Current MR Imaging. Sponsored by Berlex  
Laboratories
- 1990 Applications of Ultra-low-field MR, Experts Meeting for  
the ACCESS MR system, Toshiba-America MRI, South San  
Francisco
- 1990-present Grant reviewer, British Columbia Health Research Foundation  
13 Scientific Meeting Reviewer, Radiological Society of North  
America, Chicago, IL
- 1994 Beta Test Site investigator, Toshiba Access System
- 1996 Session Summarizer:  
Interventional AVM and Aneurysm Therapy.  
American Society of Neuroradiology, Annual Meeting,  
Seattle, WA
- 1996-present Committee Member:  
Subcommittee on Government Relations and Health  
Policy. American Society of Neuroradiology
- 1996-present Committee Member:  
Task Force on Teleradiology.  
Washington State Radiological Society



Invited Lectures:

- 1984 Basic Physics and Techniques of Magnetic Resonance Imaging, and Magnetic Resonance Imaging of the Central Nervous System  
Eastern Washington Symposium on MRI, Sponsored by the Eastern Washington Radiological Society, the Spokane Society of Neurological Science, and the Spokane Society of Internal Medicine, Spokane, WA.  
Program Coordinator and Faculty Speaker
- 1984 Advances in Neuroradiology.  
American Association of Neuroscience Nurses, Northwest Chapter, Seattle, WA
- 1984 Computed Tomography of Acute Brain Disorders.  
Clinical Neurological Conference, University of Washington, Seattle WA
- 1984 Seminar in Neurological Computed Tomography.  
Gray's Harbor Hospital, Aberdeen, WA
- 1985 Magnetic Resonance Imaging of the CNS.  
Neurosurgery Grand Rounds, U. of Washington, Seattle, WA
- 1985 Magnetic Resonance Imaging of the Orbit.  
Washington State Academy of Ophthalmology, Seattle, WA
- 1985 Magnetic Resonance Imaging of Vascular Lesions of the Central Nervous System.  
Radiology Northwest, Continuing Medical Education, University of Washington, Seattle, WA
- 1985 Magnetic Resonance Imaging: Clinical and Technical Considerations.  
Institute of Applied Physiology and Medicine, Seattle, WA
- 1985 Techniques in Neuroimaging. Clinical Neurology Conference, University of Washington, Seattle WA
- 1985 Practical Aspects of Magnetic Resonance Imaging. Clinical Neurological Conference, U. of Washington, Seattle WA
- 1986 Frank Walsh Society International Meeting in Ophthalmology; Neuroradiology Consultant in Case Presentations.  
Seattle, WA
- 1986 Petrosal Vein Sampling in Cushing's Syndrome.  
Endocrinology Grand Rounds, University of Washington. Seattle, WA
- 1986 Moderator, Head and Neck Session, Pacific Northwest Radiological Society, Seattle, WA
- 1986 Imaging of Alzheimer's Disease: Research Perspectives.  
Alzheimer's Research Seminar, University of Washington Seattle, WA
- 1986 Sensorimotor Testing in Patients with Brain Lesions.  
Neurosurgery Grand Rounds, University of Washington Seattle, WA
- 1986 Neuroimaging for Neurology Housestaff. Neurology Grand Rounds, University of Washington, Seattle, WA
- 1986 Magnetic Resonance Imaging of the CNS. Radiology Conference, Sunnybrook Medical Centre, University of Toronto. Toronto, Ontario, Canada.
- 1987 Imaging of the CNS in AIDS. AIDS Research and Clinical



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Care Conference, Department of Medicine, Harborview  
Medical Center, Seattle WA.

- 1987 Brain and Spine Imaging Using Gd-DTPA  
Continuing Medical Education Course, Advances in Magnetic  
Resonance Imaging  
University of Washington, Seattle, WA
- 1987 Neuroimaging  
Continuing Medical Education, Medico-Legal Aspects of  
Neurology  
University of Washington, Seattle, WA, and  
Washington State Association of Defense Counsel
- 1988 Spine Imaging using Magnetic Resonance  
North Shore Radiological Society  
Salem, MA
- 1989 MR Evaluation of Spinal Neoplasms  
University of New Mexico, Albuquerque, NM
- 1989 MR Imaging Strategies  
University of New Mexico, Albuquerque, NM
- 1989 MR Imaging of the Spine  
University of New Mexico, Albuquerque, NM
- 1989 MR and CT Imaging of Head Trauma  
University of New Mexico, Albuquerque, NM
- 1990 MR and CT of Acute Head Trauma,  
Tufts-New England Medical Center, Boston, MA
- 1990 STIR at Low-field--Applications at Ultra-low-field,  
Toshiba-America MRI, South San Francisco, CA
- 1992 Medical Imaging of Brain and Spine Disease,  
Washington State Trial Lawyers Association, Seattle, WA
- 1995 MR of the Brain  
MR of the Cervical and Thoracic Spine  
MR of the Lumbar Spine  
Presented at the Third Annual Low-Field MRI Course,  
sponsored by Toshiba America Medical Systems, Washington,  
D.C.
- 1995 Diagnostic Imaging of Head Injuries,  
Presented at the Washington State Trial Lawyers  
Association, Legal Education Seminar "Head Injuries: The  
Cutting Edge in Medicine and Law."



## BIBLIOGRAPHY

Stimac, G.K.: Detection of transuranium elements in the cosmic rays. Bachelors thesis, Physics Department, Massachusetts Institute of Technology, 1970.

Stimac, G.K.: Clinical application of microwave radiometry techniques in the detection of cancer. Masters thesis, Physics Department, Massachusetts Institute of Technology, 1975.

Stimac, G.K.: The scanning proton microprobe: Development for trace element analysis in nutrition and food science. Doctoral thesis, Physics Department, Massachusetts Institute of Technology, 1979.

Barrett, A.H., Myers, P.C. (Contributors Lele, P.P., Stimac, G.K., and Sadowsky, N.L.): Subcutaneous temperatures: a method of noninvasive sensing. Science 190: 669-671, 1975.

Gooding, C.A., Stimac, G.K.: Jugular vein obstruction caused by turning of the head. Am. J. Neuroradiol 4: 1223-1226, 1983; also published in Am. J. Roentgenology 142: 403-406, 1984.

Budinger, T.F., Lauterbur, P.C., (Contributors Koenig, S., Roos, M., Stimac, G.K.): Nuclear magnetic resonance technology for medical studies. Science 226: 288-298, 1984.

Stimac, G.K., Brant-Zawadzki, M.: CT of acute brain disorders: part 1. trauma. Applied Radiol. 13: 97-102, 1984.

Kerlan, R.K., Stimac, G.K., Pogany, A.C., Ring, E.J.: Bile flow through drainage catheters: an in vitro study. Am. J. Roentgenology 143: 1085-1087, 1984.

Bank, W.O., Stimac, G.K., Hecht, S.T., Mido, K., Powers, S.K.: Neuropsychiatric reactions and side effects following water-soluble myelography: comparison of iopamidol and metrizamide. Invest. Radiol. 19(5): S272-S274, 1984.

Stimac, G.K., Brant-Zawadzki, M.: CT of acute brain disorders: part 2. vascular abnormalities, acute inflammatory disease, and neoplasms. Applied Radiol. 14(1): 70-77, 1985.

Tress, B., Stimac, G.K., Brant-Zawadzki, M.: Nuclear magnetic resonance imaging. Applications in the diagnosis of cerebrospinal diseases. Medical Journal of Australia, 142(1): 25-28, 1985.

Stimac, G.K., Solomon, M.A., Newton, T.H.: CT and MR of angiomatous malformations of the choroid plexus in patients with Sturge-Weber disease. Am. J. of Neuroradiol 7: 623-627, 1986.

Dailey, R., Mills, R., Stimac, G.K., Shults, G., Kalina, R.: The natural history and CT findings of acquired hyperopia with choroidal nevi. Ophthalmology 93: 1336-1342, 1986.



Stimac, G.K., McNabb, D., Porter, B.A., Olson, D.O.: Efficiency and cost considerations in MRI of the central nervous system. Bulletin of Magnetic Resonance 8: 212, 1986.

Acheson, M., Livingston, R., Richardson, M., Stimac, G.K.: High resolution CT scanning in the evaluation of cervical spine fractures: comparison with plain-film examinations. Am. J. Roentgenology 148: 1179-1185, 1987.

Stimac, G.K., Burch, D., Livingston R.R., Anderson P., Dacey R.G.: A device for maintaining cervical spine stabilization and traction during CT scanning. Am. J. Roentgenology 149: 345-346, 1987.

Rivara, F.P., Tanaguchi, D., Parish, R.A., Stimac, G.K., Mueller, B.: Poor prediction of positive computed tomographic scans by clinical criteria in symptomatic pediatric head trauma. Pediatrics 80: 579-583, 1987.

Varnell, R.M., Stimac, G.K., Fligner, C.L.: CT diagnosis of toxic brain injury in cyanide poisoning: considerations for forensic medicine. Am J Neurorad 8: 1063-1066, 1987.

Stimac, G.K., Mills, R., Dailey, R., Shults, G., Kalina, R.: CT evaluation of acquired hyperopia with choroidal folds. Am. J. Neuroradiol 8: 1107-1111, 1987.

Stimac, G., Stimac, G.K., Jenkins, J.P.R., Hueftle, M.G.: Gd-DTPA improves MR studies of the intradural spine: Imaging news review. Diagnostic Imaging, pp 60-70, Nov 1987.

Bertino, R., Porter, B.A., Stimac, G.K., Tepper, S.: Short inversion time inversion recovery (STIR) MR imaging of spinal epidural abscess. Am J Neurorad 9:563-564, 1988.

Stimac, G.K., Reifler, B., Prinz, P., Gerlach, R., Genton M.: MR imaging in the evaluation of dementia of the Alzheimer type. Bull. Mag. Res. 10(3-4):119-123, 1988.

Stimac, G.K., Porter, B.A., Olson, D.O., Gerlach, R., Genton, M.: Gd-DTPA enhanced MR of spinal neoplasms: Preliminary investigation and comparison with unenhanced spin-echo and STIR. Am J. Neurorad 9:839-846, 1988. Also published in Am J. Roentgenology 151:1185-1192, 1988.

Stimac, G.K., Sundsten, J.W., Prothro, J.S., Gerlach, R., Sorbonne R.: Contour reconstructions in three-space of the skull, face, and brain from cross-sectional CT and MR images. Am. J. Roent. 15:807-810, 1988.

Coleman, L.K., Porter, B.A., Redmond, J., Olson, D.O., Stimac, G.K., Dunning, D.M., Friedl, K.E.: Early diagnosis of spinal metastases by CT and MR Studies. J. Comp. Assist. Tomography 12:423-426, 1988.



Markam, O., Lupton, B., Li, D., Stimac, G.K., Roland, E.H., Hill, A., Whitfield, M.F., Norman, M.G.: MR imaging of periventricular leukomalacia (PVL) in childhood. Am. J. Neurorad. 10:111-118, 1989. Also published in Am J. Roentgenology 152:583-590, 1989.

Newell, D.W., LeRoux, P.D., Dacey, R.G., Stimac, G.K., Winn, H.R.: CT infusion scanning for the detection of cerebral aneurysms. J. Neurosurg. 71:175-179, 1989

Sze, G., Stimac, G.K., Bartlett, C., Dillon, W.P., Haughton, V.M., Orrison, W., Kashanian, F., Goldstein, H.A.: Multicenter study of Gadopentetate dimeglumine as an MR contrast agent: evaluation in patients with spinal tumors. Am. J. Neurorad. 11:967-974, 1990

Grafton, S.T., Sumi, S.M., Stimac, G.K., Alvord, E.C., Shaw, C.M., Nochlin, D.: Comparison of post mortem magnetic resonance imaging and neuropathologic findings in the cerebral white matter. Archives of Neurology. 48:293-298, 1991

Gean-Marton, A.D., Vezina, L.G., Marton, K.I., Stimac, G.K., Peyster, R.G., Taveras, J.M., Davis, K.R.: Abnormal corpus callosum: a sensitive and specific indicator of multiple sclerosis. Radiology. 180:215-221, 1991

Orrison, W.W., Stimac, G.K., Stevens, E.A., LeMasters, D.L., Espinoza, M.C., Cobb, L., Mettler, F.A.: Comparison of CT, low-field-strength MRI, and high-field-strength MRI. Radiology. 181:121-127, 1991

Porter, B.A., Smith, J.P., Stimac, G.K.: Magnetic Resonance Imaging for Marrow-Infiltrating Neoplasms. Western Journal of Medicine, April, 1992, 156(4):437

Orrison, W.W., Hart, B.L., Gentry, L.R., Stimac, G.K., Tarrel, R.M., Espinoza, M., Cobb, L.: Blinded comparison of cranial CT and MR in closed head injury. Am. J. Neurorad. 15:351-356, 1994

Geborski, S.S., Atlas, S.W., Stimac, G.K., et al.: RSNA '93, 79<sup>th</sup> scientific assembly and annual meeting notes, Neuroradiology. Radiology 190:924-936, 1994

Coleman, L.K., Porter, B.A., Redmond, J., Olson, D.O., Stimac, G.K., Dunning, D.M.: Short TI inversion recovery (STIR) sequence magnetic resonance imaging in the evaluation of spinal metastases. (in preparation) J. Clin. Onc.

Newell, D.W., Stimac, G.K., Steege, T., Dacey, R.G., Winn, H.R.: High resolution CT in the identification of aneurysms in patients with subarachnoid hemorrhage: prospective evaluation for angiography. (in preparation) Arch. Neurol.



## Handbooks

Stimac, G.K.: Neuroimaging: a manual for evaluation of the brain, head, neck, and spine. ASUW Publishers, University of Washington, 1985, 1986, and 1987. This manual has been used throughout the University of Washington Hospital system for patient care and resident and medical student education. Copies are in use in Canada, England, Brazil, and in both eastern and western United States. The manual is also used as a guideline for imaging protocols by Picker International.

Stimac, G.K.: Diagnostic imaging: A Preliminary Chapter in Neuroimaging. ASUW Publishers, University of Washington, 1986. This manual has been used for resident and student training throughout the University of Washington Hospital system.

## Video, Television, Telecommunications, and Computer Productions

Stimac, G.K.: "Femoral Arterial Puncture", a videotape teaching resource in neuroradiological techniques for residents, students, and visiting faculty. Produced and directed by G.K. Stimac with assistance of Instructional Media Services, University of Washington, 1984.

Stimac, G.K.: Featured discussant on brain imaging using computed tomography and magnetic resonance imaging for "A Series on Aging: Dementia of the Alzheimer's Type and Caring for the Alzheimer's Victim", a documentary for the Public Broadcasting System. Produced by Glen Glen Productions and sponsored by the Hillhaven Corporation. Televised over participating PBS stations nationwide in December, 1986.

Stimac, G.K.: Participant in a national teleconference on paramagnetic contrast agents in magnetic resonance imaging. Produced by Decker Research Associates, Chadds Ford, PA.

Stimac, G.K.: "The central nervous system: A computerized database of disease summaries for neuroimaging. Part 1. Ophthalmological Diseases." The program uses DBASE III for instant recall of information arranged in a display format and is designed to be used in clinical care and teaching.

Sundsten, J.W., Stimac, G.K., and Prothero, J.S.: "Three dimensional contour surfaced images of the brain", a demonstration and instructional videotape showing static images and on-line manipulation of three dimensional renderings of the brain, skull, and face constructed from CT, MR and anatomical sections.

Sundsten, J.W., Stimac, G.K., and Prothero, J.S.: "Three dimensional contour surfaced images of mass lesions in the brain: An aid to treatment planning", a demonstration videotape showing on-line manipulation of three dimensional views of three brain tumors, constructed from MR scans.



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Textbooks, Chapters, and Teaching Materials

Stimac, G.K.: Introduction to Diagnostic Imaging. 1992 W.B. Saunders. This graduate level textbook covers all aspects of modern diagnostic radiology. Available in English, Italian, and Portuguese editions.

Stimac, G.K.: The Central Nervous System: A computerized database of disease summaries for neuroimaging.

Kilcoyne, R., Stimac, G.K., Livingston, R.R.: CT of thoracic spine injury. In Noninvasive musculoskeletal imaging, Richardson M.L., W.B. Saunders (in press).

Livingston, R.R., Richardson, M.L., Acheson, M.B., Stimac, G.K.: CT of cervical spine trauma. In Noninvasive musculoskeletal imaging, Richardson M.L., Ed., W.B. Saunders (in press).



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Abstracts of Presentations at National and International Meetings

Bank, W.O., Stimac, G.K., Hecht, S.T., Mani, J., Weinstein, P.R., Martin, N.A.: Multiprojectional stereo digital angiography for the evaluation of aneurysms, AVMs, and fistulas. American Society of Neuroradiology. San Francisco, CA 1983.

Kerlan, R.K., Stimac, G.K., Pogany, A.C., Ring, E.J.: An in vitro analysis of bile flow mechanics. Radiological Society of North America. Chicago, IL, 1983.

Stimac, G.K., Brant-Zawadzki, M., Norman, D., Mills, C.M., Newton, T.H., Solomon, M.A., Haas, D.: Magnetic resonance imaging of intracranial vascular lesions. American Society of Neuroradiology. Boston, MA, 1984.

Solomon, M.A., Brant-Zawadzki, M., Mills, C.M., Norman, D., Newton, T.H., Stimac, G.K., McCreary, J.: Magnetic resonance imaging of intracranial hemorrhage and hematoma. American Society of Neuroradiology. Boston, MA, 1984.

Kjos, B.O., Brant-Zawadzki, M., Kelly, W., Newton, T.H., Norman, D., McCreary, J., Mills, C.M., Stimac, G.K., Wilson, C.B.: Magnetic resonance imaging of cystic lesions of the central nervous system. American Society of Neuroradiology. Boston, MA 1984.

Kelly, W., Norman, D., Brant-Zawadzki, M., Wilson, C.B., Mills, C.M., Kjos, B.O., Solomon, M., Newton, T.H., Stimac, G.K., McCreary, J.: Specificity and sensitivity of magnetic resonance imaging in brain neoplasms. American Society of Neuroradiology. Boston, MA, 1984.

Stimac, G.K.: Basic physics and techniques of magnetic resonance imaging. Eastern Washington Radiological Society. Spokane, WA, 1984.

Stimac, G.K.: Magnetic resonance imaging of the central nervous system. Eastern Washington Radiological Society. Spokane, WA, 1984.  
Eastern Washington Symposium on Magnetic Resonance Imaging

Stimac, G.K., Brant-Zawadzki, M., Norman, D., Newton, T.H.: Magnetic resonance imaging of meningiomas. Western Neuroradiological Society. Santa Barbara, CA, 1984.

Stimac, G.K.: Basic magnetic resonance interpretation. Canadian American Medical and Dental Association. Vail, CO, 1985.

Stimac, G.K.: Magnetic resonance imaging of vascular lesions of the central nervous system. Radiology Northwest. Seattle, WA, 1985.

Stimac, G.K.: Imaging of extracranial and intracranial vascular lesions using magnetic resonance. The International Symposium on Ultrasound Diagnosis of Cerebrovascular Disease. Seattle, WA, 1985.



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Stimac, G.K., Livingston, R.R., Dacey, R.G., Winn, H.R.: CT identification of congenital cerebral aneurysms: Assistance in angiography planning. Western Neuroradiological Society. Monterey, CA, 1985.

Stimac, G.K., Acheson, M.B., Livingston, R.R., Richardson, M.: High resolution CT scanning of acute cervical spine injuries. Comparison with emergency plain-film diagnosis. Western Neuroradiological Society. Monterey, CA, 1985.

Dailey, R., Mills, R., Stimac, G.K., Shults, G., Kalina, R.: The natural history and CT findings of acquired hyperopia with choroidal folds. American Academy of Ophthalmology, San Francisco, CA, 1985.

Acheson, M.B., Livingston, R.R., Stimac, G.K., Richardson, M.: High resolution CT scanning in the evaluation of cervical spine fractures: comparison with plain-film examinations. Radiological Society of North America. Chicago, IL, 1985.

Dubinsky, T.J., Stimac, G.K., Richardson, M.L., Graham, M.M.: Application of a digital processing model for pulmonary function imaging to a single, dynamically acquired radionuclide ventilation-perfusion scan. Radiological Society of North America. Chicago, IL, 1985.

Stimac, G.K., Mills, R., Dailey, R., Shults, G., Kalina, R.: High resolution CT in the evaluation of acquired hyperopia with choroidal folds. American Society of Neuroradiology. San Diego, CA, 1986.

Olson, D.O., Nyberg, D., Porter, B.A., Stimac, G.K., Bolender, N.F.: High resolution TMJ imaging using surface coils with MRI. Pacific Northwest Radiological Society. Seattle, WA, 1986.

Selby, B., Stimac, G.K., Sawyer, P., Peters, M.: The effect of metrizamide on CSF chemistries. Association of University Radiologists. Hartford, CN, 1986.

Stimac, G.K., Reifler, B., Prinz, P., Gerlach, R., Porter, B.A., Olson, D.O.: MRI of dementia of the Alzheimer type: preliminary investigations into the evaluation of structural abnormalities and blood-brain-barrier defects. International Society of Magnetic Resonance. Rio de Janeiro, Brazil, 1986.

Olson, D.O., Morrison, K., Porter, B.A., Williams, D., Gangarosa, R., Stimac, G.K., McNabb, D.: NMR evaluation of temporomandibular joint dysfunction: strategies involving optimized receiver coil geometries. International Society of Magnetic Resonance. Rio de Janeiro, Brazil, 1986.

Stimac, G.K., Olson, D.O., Porter, B.A., Genton, M.: Short TI inversion recovery (STIR) sequences of the central nervous system. Western Neuroradiological Society, Palm Springs, CA, 1986.

Stimac, G.K., Olson, D.O., Porter, B.A., Genton, M.: Short TI inversion recovery (STIR) sequences in evaluation of the brain. American Society of Neuroradiology, New York City, NY, 1987.



Stimac, G.K., Porter, B.A., Olson, D.O., Gerlach, R., Genton, M.: Gd-DTPA enhanced imaging of spinal tumors. Society of Magnetic Resonance in Medicine, New York City, NY 1987.

Porter, B.A., Olson, D.O., Stimac, G.K., Shields, A., Nelson, S.: STIR imaging of marrow malignancies. Society of Magnetic Resonance in Medicine, New York City, NY 1987.

Olson, D.O., Porter, B.A., Stimac, G.K., Genton, M.: Clinical and economic advantages of low field short TI inversion recovery (STIR) imaging. Society of Magnetic Resonance in Medicine, New York City, NY 1987.

Porter, B.A., Olson, D.O., Stimac, G.K., Shields, A., Nelson, S.: Low field STIR imaging of marrow malignancies. Radiological Society of North America, Chicago, IL 1987.

Anderson, P., Stimac, G.K., Laohpratika, V.: Comparison of conventional myelography and CT myelography in the evaluation of spinal fractures. Cervical Spine Research Society, Washington, D.C. 1987.

Maxwell, J.K., Stimac, G.K., Townes, B.: Traumatic tactile interhemispheric disconnection and MR scan findings: a case study. International Neuropsychological Meeting, New Orleans, LA 1988.

Colman, L.K., Porter, B.A., Redmond, J., Olson, D.O., Stimac, G.K., Dunning, D.M.: Short TI inversion recovery (STIR) sequence MRI in the evaluation of spinal metastases. Am. Soc. Clin. Onc., New Orleans, LA 1988.

Grafton, S., Sumi S.M., Alvord, E.C., Stimac, G.K.: Neuropathologic correlation of cerebral white matter abnormalities detected on postmortem MR scans. Pacific Northwest Neurological Society. Vancouver, British Columbia, 1988.

Stimac, G.K., Sundsten, J.W., Prothro, J.S., Gerlach, R., Sorbonne R.: Contour reconstructions in three-space of the skull, face, and brain from cross-sectional CT, MR, and anatomic sections. American Society of Neuroradiology, Chicago IL, 1988.

Stimac, G.K., Porter, B.A., Olson, D.O., Gerlach, R., Genton, M.: Gd-DTPA dimeglumine enhanced MR of spinal neoplasms: comparison with unenhanced spin-echo and STIR. American Society of Neuroradiology, Chicago IL, 1988.

Stimac, G.K., Sundsten, J.W., Prothero, J.S., Prothero, J.W.: Three dimensional contour-surfaced imaging in the evaluation of mass lesions in the brain. Western Neuroradiological Society, San Diego, CA, 1988

Porter, B.A., Redmond, J., Coleman, L.K., Dunning, D.M., Olson, D.O., Stimac, G.K., Borrow J.W.: Low field T1 SE and STIR imaging of spinal malignancies. Radiological Society of North America. Chicago, IL, 1988



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G. fton, S.T., Sumi, S.M., Stimac, G.K., Nochlin, D., Shaw, C.M.  
Lord, E.C. Jr.: Neuropathologic correlates of cerebral white matter  
changes detected by post mortem magnetic resonance imaging. The American  
Neurological Association, New Orleans, LA, 1989

Orrison, W.W., Stimac, G.K., LeMasters, D.L., Stevens, E.A., Espinoza, M.:  
Multiobserver, double-blind evaluation of CT, 0.064 T MRI, and 1.5 T MRI.  
Radiological Society of North America. Chicago, IL, 1989

Gean-Marton, A.D., Vezina, L.G., Peyster, R.G., Stimac, G.K., Taveras,  
J.M., Davis, K.R.: Abnormal corpus callosum: sensitive and specific  
indicator of multiple sclerosis. Radiological Society of North America,  
1989.

Hadford, D.J., Orrison, W.W., Stimac, G.K., Kelsey, C.A.: Ultra low-field  
Gd-DTPA-enhanced MR imaging: dosage and administration. Radiological  
Society of North America, 1989.

Orrison, W.W., Stimac, G.K., LeMasters, D.L., Stevens, E.A., Espinoza, M.:  
Blinded comparison of cranial emergency room CT and MRI. American Society  
of Neuroradiology. Washington, D.C., 1991



Scientific Exhibits Presented at National and International Meetings

Acheson, M.B., Livingston, R.R., Stimac, G.K., Richardson, M.: High resolution CT scanning in the evaluation of cervical spine fractures: comparison with plain-film examinations. Radiological Society of North America. Chicago, IL, 1985. (Honorable Mention award)

Stimac, G.K., McNabb, D., Porter, B.A., Olson, D.O.: Cost and efficiency considerations in MRI of the central nervous system: scanning protocols for maintaining high throughput and quality evaluation. International Society of Magnetic Resonance. Rio de Janeiro, Brazil, 1986.

Porter, B.A., Richardson, M.L., Wesbey, G.E., Olson, D.O., Cromwell, L.D., Stimac, G.K.: Classification and investigation of artifacts in magnetic resonance imaging. International Society of Magnetic Resonance. Rio de Janeiro, Brazil, 1986.

Olson, D.O., Stimac, G.K., Porter, B.A., McNabb, D., Nelson, S.: Telecommunications in radiology. Radiological Society of North America. Chicago, IL, 1986.

Fligner, C.L., Luthi, R., Linkaityte-Weiss, E., Stimac, G.K., Raisys, V.A., Reay, D.T.: Cyanide poisoning from capsule tampering: clinical, pathologic, and toxicologic aspects. American Academy of Forensic Sciences. Los Angeles, CA, 1987.

Stimac, G.K., Olson, D.O., Porter, B.A., Genton, M.: Short TI inversion recovery (STIR) sequences in evaluation of the brain. American Society of Neuroradiology, New York City, NY, 1987.

Varnell, R.M., Stimac, G.K., Fligner, C.L., Raisys, V.A., Reay, D.T.: CT diagnosis of acute cyanide poisoning: clinical, pathologic, and toxicologic aspects. American Society of Neuroradiology, New York City, NY, 1987.

Sundsten, J.W., Prothro J., Stimac, G.K.: Interactive Computer Graphics in Biological Structure. Symposium on Biomedical Advances through the use of Modern Imaging Methods. Sponsored by the School of Medicine, Center for Advanced Studies, Graduate School, and Cardiovascular Pathology Training Program. University of Washington, Seattle, WA, 1987

Stimac, G.K., Porter, B.A., Olson, D.O., Gerlach, R., Genton, M.: Gd-DTPA dimeglumine enhanced MR of spinal neoplasms: comparison with unenhanced spin-echo and STIR. American Society of Neuroradiology, Chicago IL, 1988.

Stimac, G.K., Sundsten, J.W., Prothro, J.S., Gerlach, R., Sorbonne R.: Contour reconstructions in three-space of the skull, face, and brain from CT, MR, and anatomic sections. American Society of Neuroradiology, Chicago IL, 1988. (Magna Cum Laude award)

Stimac, G.K., Sundsten, J.W., Prothero, J.S.: Contour Surfaced imaging in evaluation of mass lesions in the brain. American Society of Neuroradiology, Orlando FL, 1989.



Stimac, G., Bartlett, C., Dillon, W.P., Haughton, V.M., Orrison, W., Stimac, G.E., Kashanian, F., Goldstein, H.A.: Gadopentetate dimeglumine as an MR contrast agent in the spine: Results of a multicenter study. American Society of Neuroradiology, Orlando FL, 1989.

Anderson, M.L., Wolpert, S.M., Strand, R., Stimac, G.K., Kluznick, R.: Neuroimaging of inborn errors of metabolism. Radiological Society of North America, 1989. (Awarded Certificate of Merit).

Stimac, G.K., Grafton, S., Sumi S.M.: Neuropathologic correlation of cerebral white matter abnormalities detected on postmortem MR scans. American Society of Neuroradiology, Los Angeles, CA 1990.

Anderson, M.L., Wolpert, S.M., Kluznick, R., Barnes, P., Stimac, G.K., Kwan, E.S.K.: Neuroimaging of inborn errors of metabolism. American Society of Neuroradiology, Los Angeles, CA 1990.

Orrison, W.W., Gentry, L.R., Stimac, G.K., Cobb, L., Espinoza, M.: Blinded comparison of cranial emergency room CT and MRI. Radiological Society of North America, Chicago, IL, 1991.

Orrison, W.W., Stimac, G.K., Stevens, E.A., LeMasters, D.L., Espinoza M.: Comparison of CT, ultra-low field MRI and high-field MRI. Radiological Society of North America, Chicago, IL, 1991.

Orrison, W.W., Stimac, G.K., Stevens, E.A., LeMasters, D.L., Espinoza M.: Comparison of CT, ultra-low field MRI and high-field MRI. American Society of Neuroradiology, St. Louis, MO, 1992.

Orrison, W.W., Benzel, E.C., Stimac, G.K., Stevens, E.A., LeMasters, D.L., Espinosa, M.C.: Comparison of CT, ultra-low field MRI and high-field MRI. Congress of Neurological Surgeons Annual Meeting, Washington, D.C., 1992.

Stimac, G.K.: Image transmission for CT evaluation in Alaska. Alaska Rural Health Conference, Anchorage, AK, 1992.



## TECHNOLOGY DEVELOPMENT IN RADIOLOGY

Clinical application of short TI inversion recovery (STIR) for Central nervous system imaging at low field. (Picker 0.15 T resistive system).

Clinical application of STIR at high field for musculoskeletal and spine imaging. Application to tumor and trauma. (GE Signa 1.5 T).

Application of MR to bone marrow imaging (Picker 0.15 T, and GE Signa 1.5 T).

Clinical application of variable bandwidth technique for high field CNS imaging. (GE Signa 1.5 T).

Development of ultra low field strategies for Gd-DTPA enhanced scanning (Diasonics Access 0.064 T).

Comparison of Ultra low field MR, high field MR, and CT in the evaluation of CNS disease (Diasonics Access 0.064 T, GE Signa 1.5T, and GE 9800 CT).

Clinical trials of Gd-DTPA for contrast enhanced MR of the brain. (Berlex Labs, Picker 0.15 T).

Clinical trials of Gd-DTPA for contrast enhanced MR of the spine. (Berlex Labs, Picker 0.15 T).

Clinical evaluation of clear-base film for laser cameras (3-M Laser Camera).

Development of hardware for improved contrast and latitude in laser cameras (3-M Laser Camera).

Three-dimensional imaging of the brain and skull using a computerized contour-surfaced technique (Department of Biological Structure, University of Washington).

Remote site modem transmission of radiographic images for clinical consultation (West Coast Video).

Remote site satellite transmission of radiographic images for routine clinical interpretation (Vortech Data and Imaging Network of Seattle).

Clinical application of a cervical spine support for CT scanning in the evaluation of patients with unstable spine injuries (University of Washington).

Clinical investigation of contrast infusion CT in the evaluation of intracranial aneurysms (GE 9800).

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Clinical application of Xenon gas enhanced CT in the evaluation of epilepsy, tumor and head trauma (GE 9800 CT and Xenon delivery system).

Computer databased information recall system. (DBASE III, IBM XT and AT computers).

Software optimization of CT scan protocols for neuroimaging (Picker 1200 CT).

Microwave radiometry techniques in the detection of cancer. (Massachusetts Institute of Technology).

Development of a scanning proton microprobe and use in measurement of elemental composition of biological tissues (Massachusetts Institute of Technology, Harvard University, Harvard Medical School, and Lincoln National Laboratories).

Development of image transmission system for remote interpretation of CT scans (Vortech Data, Inc.)

Optical disk archiving of radiographic images for clinical care, teaching, and research (Vortech Data, Inc.).

The use of cryptography in digital signature security.



## **Resume**

**John D. White, M.D.**  
**8269 Jordan St. S.E.**  
**Salem, Oregon 97301-9146**  
**January 1, 1997**

**Born: Columbus, Mississippi, 11-17-35**

**Pre-college education in Louisiana public schools**

**College: Louisiana State University, B. S., 1956**

**Medical School: Louisiana State University, 1960**

**Internship: University of Michigan, 1960-61**

**Residency, General Surgery: University of Michigan, 1960-1962**

**Residency, Neurological Surgery: University of Michigan, 1962-1966**

**U. S. Air Force, Captain, August, 1966-August, 1968**

**Chief, Neurosurgery, Keesler AFB Hospital, 1967-1968**

**Private practice of Neurosurgery, Salem, Oregon, August, 1968 to present**

**I belong to, or have been accepted for membership in the following professional societies:**

**Oregon Medical Association-member 1968 to present**

**Congress of Neurological Surgeons 9-23-68**

**Oregon Neurosurgical Society 6-7-69**

**Secretary, 1983-84**

**Vice President, 1985**

**President, 1986, 87, 88**

**American Association of Neurological Surgeons 1968 to present**

**American College of Surgeons: certified 10-21-71**

**American Board of Neurological Surgeon: certified 5-11-70**

**Joint Section on Spine, AANS & CNS**

**Salem Hospital Medical Staff, 1968 to present**

**Chairman, Dept. of Neurosurgery, several years**

**OHSU, Courtesy Staff, 1971**

**Silverton Hospital, Visiting Staff, 1980 to present**

**[The abbreviated resume presented above does not list such things as scientific meetings attended, various Continuing Education Courses, etc.]**

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**ATTORNEYS AT LAW**



## EMMA Y. VASQUEZ

10850 Richmond Avenue Suite #340  
Houston, Texas 77042  
(713) 783-6775

### EDUCATION

Postgraduate 1997	Life Care Planning Rehabilitation Training Institute University of Florida
Postgraduate, 1981	Vocational Counseling, Texas A&M University, College Station, TX
M. S. 1980	Counseling & Guidance Texas A&I University, Kingsville, TX
B. S. 1969	Education, Texas Woman's University, Denton, TX

### PROFESSIONAL EXPERIENCE

01/88 - Present	<u>Rehabilitation Consultant</u> , Private Practice. Provide rehabilitation services to clients referred by insurance companies, physicians, attorneys and other agencies involved in worker's compensation and/or personal injury claims. Services include medical record reviews, life care plans, cost analysis, medical assessment and coordination, vocational testing, vocational evaluation, vocational counseling, job analysis, job placement, work tolerance evaluation and expert witness testimony. Provide vocational counseling and consulting to several work hardening centers in the Houston area.
01/88 - 03/89	<u>Counselor/Consultant</u> , Drug Free Schools and Communities, Houston Independent School District, Houston, Texas. Provided counseling for drug abuse related problems to students grades K-12, parents, and school faculties in a sub-district consisting of thirteen schools, provided on-going counseling to drug dependent students. Development of drug awareness curriculum and other related materials.
02/86 - 01/88	<u>Rehabilitation Coordinator</u> , Underwriters Adjusting Company Continental Insurance, Houston, Texas. Developed, coordinated, and implemented medical and vocational services for work-related injured clients covered under worker's compensation laws. Marketed services to insurance companies, attorneys, and physicians
08/82 - 01/86	<u>Case Manager</u> , The Institute for Rehabilitation and Research, Maximum Independence Center. Planned and coordinated comprehensive rehabilitation services (medical, physical and occupational therapy, nursing, and vocational counseling) with spinal cord, amputees, and head injured patients utilizing a team approach to insure the delivery of services and accomplishment of rehabilitation objectives.



Counselor, The Institute for Rehabilitation and Research, Vocational Services Department. Provided vocational rehabilitation to patients with severe physical disabilities including spinal cord, amputees, and head injury. Services included vocational and educational assessment, vocational and psychosocial counseling, vocational and educational planning, job analysis and job modifications, participation in team rounds and staffings.

02/80 - 06/82

CETA Analyst II, City of Corpus Christi, Coastal Bend Intake Unit. Administered and supervised rural intake office staff, interviewed and developed appropriate vocational objectives with applicants. Maintained public relations and contact with local businesses and local elected officials. Accepted referrals of disadvantaged clients from community resources.

Acting Field Center Coordinator, City of Corpus Christi, Employment Opportunity Pilot Program. Administered and coordinated program operations, supervised professional and support field staff, and engaged in public relations with local, county, and state officials.

Vocational Counselor, City of Corpus Christi, Employment Opportunity Pilot Program. Provided personal and vocational adjustment counseling to disadvantaged and underemployed clients, coordinated programs and community resources. Administered all testing to participants.

09/78 - 08/79

Consultant, Texas State Teachers Association, UniServe Division, Austin, Texas. Provided technical assistance to local, district, and state association leadership and educators in developing membership promotion, professional negotiations, public relations, legislative and political action committees, professional development, and grievance processing.

08/69 - 06/78

Teacher, Austin Independent School district, Northside Independent School District, Corpus Christi Consolidated Independent School District, Rio Grande Consolidated Independent School District. Designed and implemented lesson plans to secondary school-age students in the areas of English and home economics.

## CONSULTING POSITIONS

03/85 - 11/87

Professional Consultant to LULAC's Task Force for Disabled Hispanic Texans

01/88 - 03/89

Consultant to Houston Independent School District, Drug Free Schools and Communities

1988 - Present

Consultant to the Office of Hearings & Appeals Social Security Administration

1991 - 1992

Advisory Board Member, Baylor College of Medicine Pain Control and Functional Restoration Clinic

1996 - Present

Advisory Board Member, DRCA

1996 - Present

Consultant to Union Pacific Railroad Company



Emma Y. Vasquez

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## **CERTIFICATIONS AND LICENSURES**

Certified Case Manager #01713 by The Certification of Insurance Rehabilitation Specialists Commission, 1993

Licensed Professional Counselor #05672 by Texas State Board of Examiners of Professional Counselors, 1983 to present;  
Specialty designation, Rehabilitation Counseling, 1989 to present

Certified Rehabilitation Counselor C-19643 by National Commission of Rehabilitation Counselor Certification, 1987 to present

Vocational Counseling Certificate from Texas Education Agency, 1982 to present

Certified Chemical Dependency Specialist (CCDS) #2105-0991 by Texas Certification Board of Alcoholism and Drug Abuse Counselors, September, 1991 to present

Licensed Chemical Dependency Counselor (LCDC) #2951 by Texas Commission on Alcohol and Drug Abuse, January 1, 1992 to present

## **PROFESSIONAL AFFILIATIONS**

Texas Association of Rehabilitation Professionals in the Private Sector (TARPPS) State Membership Chair, 1993, Board Member 1990-91 and 1991-92, President Elect 1997  
1992 & 1997 State Annual Conference General Chair, 1989 Program Committee  
National Association of Rehabilitation Professionals in the Private Sector (NARPPS)  
National Rehabilitation Association (NRA)  
Texas Rehabilitation Association (TRA), Annual Conference Program Committee, 1992  
Houston Area Rehabilitation Association (HARA)  
Texas Association of Alcohol and Drug Abuse Counselors  
National Association of Alcohol and Drug Abuse Counselors

## **FOREIGN LANGUAGE**

Spanish (fluent)

7/2/97